

April 10, 2006

CEQA Initial Study - Environmental Checklist Form
(Based on the State CEQA Guidelines, Appendix G Rev. 10/98)

1. Project Number(s)/Environmental Log Number/Title:
Otay Valley Regional Park (OVRP) Trails Plan (Permit #____)
2. Lead agency name and address:
County of San Diego, Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123
3.
 - a. Contact Robert Rushlow
 - b. Phone number: (858) 694-2062
 - c. E-mail: Robert.Rushlow@sdcounty.ca.gov.
4. Project location:

The Otay Valley Regional Park (OVRP) Trails Plan is located in the southern portion of San Diego County, 4 miles north of the United States/Mexico International Boundary (see attached Figure 1). The proposed project area is bounded on the west by Saturn Boulevard (19th Street) and by Interstate 805 (I-805) on the east. On the north and south the proposed project area is bounded by existing urban development. The OVRP trail system is located within Sections 21, 22, 23, and 24 of Township 18 South, Range 2 West of the USGS 7.5' Imperial Beach, California Quadrangle.

The OVRP is within the City of San Diego Multi-Habitat Planning Area (MHPA) and the City of Chula Vista Preserve Management Area (PMA) as identified in the respective *Multiple Species Conservation Program (MSCP) Subarea Plans* of the two cities. The area between the Bayshore Bike Path to approximately 600 feet east of Hollister Street is within the City of San Diego California Coastal Commission's (CCC) Coastal Overlay Zone.

Thomas Brothers Coordinates: Page 1330, Grid A-6/G6

5. Project sponsor's name and address:

County of San Diego Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

6. General Plan Designation and ZoningCity of San Diego

The majority of the proposed project area is under the jurisdiction of the City of San Diego. The *City of San Diego Progress Guide and General Plan* designates most of the Otay Valley Regional Park (OVRP) area as "Open Space." Developed areas are designated "Residential, Industrial, or Commercial." The proposed project area is within the *Otay Mesa-Nestor Community Plan* area, which designates the majority of the proposed project area as open space. Three small areas (a total of 4 acres) west of I-805 and north of the river are designated as low-density residential, and a one-acre area is designated as industrial.

Otay Mesa-Nestor Community Plan (City of San Diego):

Land Use Designation:	Open Space & Special Study Area
	Very Low Density Residential (R1-5000)
	Industrial (M-1B)

City of Chula Vista

The remaining portion of the OVRP is within the City of Chula Vista. The *City of Chula Vista General Plan* (adopted December 13, 2005) designates the proposed project area as "Open Space;" the portion of the proposed project area within the City of Chula Vista boundary is designated as "Open Space Preserve." The General Plan Land Use Map shows a "Greenbelt Trail System" extending east to west through the OVRP. The Chula Vista Greenbelt includes developed and undeveloped open space and a potential new open space linkage to form a continuous 28-mile open space and park system around the perimeter of the City.

Chula Vista General Plan

Land Use Designation	Open Space Preserve
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The *Southwest Redevelopment Area* extends from I-5 to I-805 and from north of Main Street to the City boundary. The area between Main Street and the north rim of the river valley is designated for light industrial uses. The area bounded by Main Street, Beyer Way, and Hermosa Avenue is planned to be developed for commercial uses.

7. Description of project (Describe the whole action involved, including but not limited to later phases of the proposed project, and any secondary, support, or off-site features necessary for its implementation):

The proposed project implements a portion of the *Otay Valley Regional Park Concept Plan* adopted by the City of San Diego on April 17, 2001, the City of

Chula Vista on May 15, 2001, and the County of San Diego on May 23, 2001. The goals of the *Otay Valley Regional Park Concept Plan* include the construction of a trail system with staging areas, viewpoints, overlooks, and connections to recreation areas and adjacent public lands and trails. A “concept trail system” was designed by Otay Valley Regional Park Citizens Advisory Committee (OVRP CAC) to form a continuous, east/west, multi-use trail within the Otay River Valley. The proposed project is the construction of the Otay Valley Regional Park (OVRP) trail system and staging areas between Saturn Boulevard (19th Street) and Interstate 805 (I-805). Construction of trails system and staging areas will occur as grant funding becomes available.

During the initial design phases of the proposed project, certain sections of the “concept trail system” were altered under advisement of the consulting biologists and engineers to avoid and minimize potential impacts to sensitive habitats and species, and streambeds. Figure 2 illustrates the location of the proposed trails and staging areas, and boundary between the cities of San Diego and Chula Vista.

The proposed project was also designed to be consistent with the goals of the City of San Diego and City of Chula Vista *Multiple Species Conservation Program (MSCP) Subarea Plans*. Figures 9a, 9b, and 9c in Attachment A illustrate the location of the City of San Diego Multiple Habitat Preserve Area (MHPA), City of Chula Vista Preserve Management Area (PMA), vegetation communities, and vegetation impact areas.

The approximately 8.3-mile long (43,760± feet) trail system would be constructed on the north and south sides of the Otay River with connecting trails across the river. The trails would accommodate hikers and bicyclists; equestrians would be permitted on the trails east of Beyer Way. Signs will be located at the trailheads and in the 7 staging areas notifying trail users that the trails are located in, and adjacent to, the City of San Diego MHPA and City of Chula Vista PMA. The trails will be surfaced with native soil, decomposed granite, or crushed rock. The trail widths were kept at a minimum while accommodating hikers, bikers and equestrian safely.

An extensive informal trail system currently exists throughout the Otay River Valley and the proposed project is designed to closely follow portions of the existing trail system. Approximately 35% of the proposed trails are located within San Diego Gas & Electric easement roads used to access their facilities within the OVRP area. These existing utility access routes are graded to a minimum of 9 feet wide and will remain at that width. The remaining existing trails vary from 3 to 12 feet wide. A portion of the existing trails within the OVRP that are not designated for future use would be closed by a physical barrier such as a boulders or signage.

The proposed trail system consists of the 22 trail segments listed in Table 1. In some locations connecting trails do not exist and will be constructed to link existing trail segments. New trails account for approximately 8% of the proposed project. These new trails include:

- a. An 850-foot±-foot long section of trail segment 11 that extends from segment 1F to Finney School. This trail will be developed as a 4-foot wide Type “4” trail.
- b. A 670±-foot long portion of segment 6A along the northern side of the Otay River, beginning immediately west of Beyer Boulevard and ending at an existing service road immediately south of Hanson Aggregates.
- c. A 1,450±-foot long trail (segment 8) along both sides of Beyer Boulevard on the south side of the river.

The proposed project has been divided into 2 phases to separate the portions of the project that would be funded by the City of San Diego, and the remaining portion of the project, some of which will be funded by the County of San Diego. Construction and mitigation for each phase is contingent upon grant funds and does not imply that construction or mitigation would occur in any particular order. Phase 1 consists of the portion of trail segment 1C south of Fenton Pond, segments 5 and 1D, and staging area #4 located west of Beyer Boulevard. Phase 2 includes all of the remaining project components.

Approximately 51% of the trails would be constructed as Type “1” trails in accordance with the *Otay Valley Regional Park Trail Guidelines* (October 2003) (see Attachment C). Trail types 1, 2 3, and 4 are equivalent to trail types A, B, C and D in the *Otay Valley Regional Park Trail Guidelines* (October 2003). These trails are designed for maximum usage and would have an 8-foot tread width with a horizontal vegetation clearance of up to 2 feet beyond the edge of the trail tread. According to the trail guidelines, the purpose of the clear area is to preserve the maximum amount of natural vegetation by clearing or pruning 2 feet of natural vegetation, if required, from the tread to the outer edge of the trail.

Due to the sensitivity of the vegetation along the trail system, approximately 46% of the trail system will be constructed as Type “2” trails with a horizontal clearance of ½-foot on either side of the trail. The clearance of ½-foot throughout the most sensitive vegetation areas may be used for fencing to avoid the trampling of sensitive species. Barriers such as peeler log fencing and signs would be placed along the sections of trail adjacent to sensitive habitat. The signage wording would state “Environmentally sensitive area. Please stay on trail.”

The hillside trail to the Finney Overlook (part of segment 11) would be constructed as a Type “3” trail with a 4-foot tread width. Type “3” trails would be limited to foot traffic only. This 850±-foot (0.16-mile) long trail segment traverses the slope on the south side of the valley below Finney School. This segment is approximately 1.9% of the entire trail system.

Trail segment 1E1 adjacent to Le May Pond (east of Beyer Way) would be classified as a Type “4” trail and maintained at its current width of between 2-4 feet to avoid impacts to Orcutt’s bird’s beak.

**Table 1
Trail Segments**

Seg- ment	Trail Type				Length (feet)	From	To	Existing Conditions
	1 ^a	2 ^b	3 ^c	4 ^d				
1A	X				2,400	Saturn Blvd.	I-5	Existing trail
1B		X ^e			1,340	I-5	Hollister Street	Existing trail
1C	X ^f	X			5,840	Hollister Street	Beyer Boulevard	Existing trail
1D		X			3,520	Beyer Boulevard	Beyer Way	Existing trail
1E	X	X			5,300	Beyer Way	Junction Segment 1F & 12	Existing trail/dirt service road (in parts)
1E1				X	1,300	Trail 1E	Trail 1E	Existing trail
1F	X	X			5,640	Junction Segments 1E & 12	Rancho Drive	Existing trail/dirt service road (in parts)
2	X				380	Segment 1B	Staging Area 2	Existing trail
3 ^g		X			280	Segment 1B	Staging Area 2	Existing trail
4	X				380	Segment 1C	Hollister St. Park & Ride	Existing trail
5	X				620	Segment 6A	Fenton Pond Overlook	Existing trail
6A		X			2,320	Segment 1C (Fenton Pond)	Beyer Boulevard	Existing trail
6B	X	X			4,320	Beyer Boulevard	Montgomery High School	Existing trail and new trail (just east of Beyer Blvd.)
7	X				300	Segment 6A	Staging Area 3	Existing trail
8		X			1,450	Segment 1C (Beyer Blvd. West)	Segment 1D (Beyer Blvd. East)	New trail on Beyer Blvd. side slopes
9		X			180	Segment 1D	Segment 6B	Existing trail
10		X			1,000	Segment 1E	Staging Area 5	Existing trail
11	X		X		1,150	Segment 1F	Finney School Overlook	Existing trail below and new trail on slope to Finney School
12	X				740	Junction Segment 1E & 1F	Junction Segments 14A & 14B	Existing trail/dirt service road (in parts)
13	X				620	Segment 14B	Staging Area 7	Existing trail
14A	X				3,000	Junction Segments 12 & 14B	Staging Area 6	Existing trail
14B	X				1,430	Junction Segments 12 & 14A	Segment 1F	Existing trail
TOTAL					43,310			

Notes:

a – 8-foot tread width with a 2-foot wide clear area on each side of the tread.

b – 8-foot tread width with 0.5-foot wide clear area on each side of the tread.

c – 4-foot tread width

d – Variable tread width of 2-4 feet that conforms to existing trail.

e – Includes “at grade” crossing of Hollister Avenue.

f – Includes “at grade” crossing of Beyer Boulevard.

g – Located outside of OVRP boundary.

Retaining wall

Approximately 1,450 feet of a concrete block retaining wall would be constructed along Beyer Boulevard south of the Otay River Bridge crossing (trail segment 8). The concrete block design simulates adobe and a color will be selected to blend with the natural landscape colors of the Otay River valley and bluffs. The wall would be less than 6 feet high.

Drainage systems for the retaining wall will consist of a vegetation lined "V" ditch approximately 1-foot wide installed at the top of the walls, and down drain structures (i.e. 4-inch plastic pipe) installed behind the retaining wall. The down drain structures will convey runoff from low spots in the "V" ditch to the bottom of the wall and under the trail where the runoff will discharge into the natural drainage system.

Roadway crossings

Under crossings of roadways will be provided at I-5, Beyer Boulevard on the north and south sides of the river, and at Beyer Way. At-grade crossings will be provided at Hollister Street and at Beyer Boulevard east of Staging Area #4. The Hollister Avenue at-grade crossing north of the river will consist of stop bars for traffic and constantly flashing yellow beacons atop standard pedestrian crossing warning signs (Type W11-2). Hollister Avenue is a 2-lane local roadway in this area with a posted speed limit of 40 mph and an Average Daily Traffic (ADT) volume of 7,500.

The Beyer Boulevard at-grade crossing east of Staging Area #4 will consist of a crossing that includes a median break and pedestrian storage area that guides trail users across Beyer Boulevard. Constantly flashing yellow beacons atop standard pedestrian crossing warning signs (Type W11-2) and cross walk striping will be installed. Beyer Boulevard is a 4-lane major arterial near this crossing with a posted speed limit of 40 mph and an ADT volume of 16,000.

Staging (parking) areas #1-#3 and #5-#7

Seven local staging (parking) areas are proposed for the OVRP (see Table 2). During the construction period, these staging areas would be used for equipment staging and stockpiling of materials. The ultimate use of all staging areas is as parking areas for trail users. These six staging areas will include 10 parking spaces, including one accessible space, timber wheel stops, and bike racks. These staging areas range from approximately 0.22-acre (9,500 sq.ft.) to 0.36-acre (15,000 sq.ft.). The surface of the staging areas will be decomposed granite. A concrete walkway between the accessible parking space and the trailhead will be constructed. Entry gates and monument signs will be installed at each staging area. The staging areas would be open between the dawn and dusk. The staging areas are designed to provide vehicular parking for the use of hikers and bikers desiring to use the trail system. Equestrian loading and unloading facilities are not provided, and the staging areas are not intended for use by equestrians.

Other facilities included at each staging area include informational trailhead kiosks, one picnic table on a 14 sq.ft. concrete pad, trash receptacle, and

recyclable receptacle. A 7-foot high wooden screening fence shall be installed at each staging area for a future port-a-john. No lighting will be provided at staging areas 1-3 and 5-7. The staging areas will be surrounded by peeler log fencing and a planting area that will be hydroseeded. Native trees (California sycamore) will be planted within the planting strip.

Table 2 Staging Areas				
Staging Area	Type	Location	Jurisdiction	Access
1	Local	Saturn Blvd.	San Diego	Saturn Blvd.
2	Local	Hollister Street	San Diego	Hollister Street
3	Local	27 th Street	Chula Vista	27 th Street
4	Local	Fenton Pond (Beyer Blvd.)	San Diego	Beyer Blvd.
5	Local	Del Monte Avenue	San Diego	Del Monte Avenue
6	Local	Mace Street	Chula Vista	Mace Street
7	Local	Rios Avenue	San Diego	Rios Avenue

Staging (parking) area #4/Ranger Station

Staging area #4, located on the west side of Beyer Boulevard south of the Otay River, would be used for equipment staging and stockpiling of materials during the construction period. The ultimate use of the site includes a ranger station and parking. Staging area #4 would be slightly larger than the staging areas described above and would provide 12 parking spaces, including one accessible space, a rest room building, a ranger station building, an interpretive exhibit, 2 sets of trash and recycling bins, and 4 picnic tables. The height of both buildings would be one-story. The ranger station would include an office, conference room, break room, storage, and an employee restroom. The exterior would be stucco with a concrete shake roof. The parking area surface would be decomposed granite and surrounded by a peeler log fence. Parking lot lighting (12 to 18 feet in height) would be located near the parking spaces. The parking lot would be lighted for security purposes between sunset and 11:00 PM.

Drainage improvements at the site include recontouring the storm drain outlet area to improve drainage, extending a brow ditch to divert water into an existing channel, a catch basin in the center of the site, and a widening of the existing drainage channel along the west side of the staging area.

The existing trees in the southwest portion of the site and along Beyer Boulevard would be retained. The interior of the site would be planted with native trees, shrubs, and ground cover.

Sewer and water services for the Ranger Station and restrooms are available from Beyer Boulevard adjacent to the site. Underground electrical power service would be extended to the site from the intersection of Beyer Boulevard and Palm Avenue south of the site. Extending the underground service would require a trench adjacent to the existing sidewalk along Beyer Boulevard.

Wetland crossings

Twelve drainage crossings will be modified, enhanced or created as components of the proposed project, including 4 puncheon crossings (#2, #9, #12, #13), 1 stand-alone box culvert (#8), 5 raised trail causeways with culverts (#3, #4, #6, #7, #11), 1 raised trail causeway (#10), and one bridge (#14). Crossings #1 and #5 would not be modified by the proposed project (see Figure 2). All crossings with the exception of the Poggi Creek Bridge and the stand-alone box culvert east of Beyer Way (#8) are currently used as informal crossing without the streambed and stream bank protection that the proposed crossing would provide.

Crossings #2, #9, #12, and #13 are proposed as puncheon crossings. The puncheon crossings consist of mud sills and planks that are secured to the riverbank at trail level. Two stringers between the mud sills located on each bank would support wooden decking. The puncheons would not exceed the width of the trail. The puncheons can be removed by Park Rangers on a seasonal basis during periods of high water flows.

Crossing #8 would be a 2- x 12-foot reinforced concrete double box culvert. Crossing #10 would be constructed as a 425-foot long raised trail.

Crossings #3, #4, #6, #7, and #11 would be constructed as raised trail causeways with culverts. This type of crossing is utilized in seasonally or permanently wet areas and allows low velocity water flow to pass from one side of the trail to the other. It consists of rip-rap deposited on the bottom, finer gravel as it is built up, and a trail surface on the top.

The placement and elevation of the culverts will allow the larger storm events to overflow the crossings without affecting the path of the existing stream or river. Consequently, the larger storm events will not cause diversion of the water course, only overtopping of the trail itself. Rip-rap will be utilized for the construction of the raised trail causeways with culverts. A "No Rise Certificate" stating that the installation of the crossings will not cause a significant rise in the 100-year flood elevation will be obtained from the City of Chula Vista for crossing #11.

Crossing #14 is proposed as a bridge over Poggi Creek. The proposed prefabricated steel truss bridge would be approximately 13 feet wide and 60 feet long. The bridge would have timber decking and tubular steel sides. Footings at each end of the bridge would be located outside of delineated wetlands and the 100-floodway, but would be within the 100-year floodplain. Due to the potential for scouring in this area, riprap would be placed along the sides of the channel for 35 feet in the area of the bridge. The bridge has been designed so that it would not result in a rise of the 100-year flood elevation and the lowest bridge support beam would be above the high water level.

Table 3 Wetland Crossings

Crossing #	Trail Segment	Location	Jurisdiction	Raised Trail Causeway With Culvert	Box Culvert	Puncheon (8' wide)	Bridge	Length (ft)	Max. Width (ft)	Culver Size	Notes
1	1A	River crossing West of I-5	SD	--	--	--	--	--	--	--	No improvements required for existing box culvert.
2	1B	Tributary crossing East of I-5	SD	--	--	X	--	10'	4'	--	Construct puncheon crossing.
3	1C	River Crossing East of Hollister St.	SD	X	X	--	--	85'	16'	2'x10'	Construct 85-foot long raised trial section by elevating existing ground approximately 2 feet and 2' x 12' box culvert.
4	6	West of Fenton Pond	SD	X		--	--	150'	16	18"	Construct 150' long causeway with 18" corrugated metal culverts.
5	6A	Tributary crossing West of Beyer Blvd	CV	--	--	--	--	--	--	--	No improvements to existing 27 th St. drainage crossing. Install pedestrian railing on outside of structure.
6	6B	Tributary crossing East of Beyer Blvd.	CV	X	X		--	100'	16'	2'X12'	Construct 100-foot long raised trail causeway by elevating existing ground approximately 2 feet and construct culvert.
7	6B	River crossing West of Beyer Way	SD	X	--	--	--	550'	16'	12"	Construct 550+-foot long raised trail causeway by elevating existing ground level approximately 3 feet. Install 12-inch culverts every 50 feet.
8	10	River crossing East of Beyer Way	SD	--	X	--		100'	20'	2'x12'	Construct box culvert.
9	14A	Tributary crossing South of Mace Street	SD	--	--	X	--	20'	4'	--	Construct puncheon crossing.
10	1E	Tributary crossing South of Palm Ave. & North of Finney School	SD	X	--	--	--	425'	28'	--	Construct 425+-foot long raised trail by elevating existing ground level approximately 4 feet.
11	12	River crossing North of Finney School	CV	X	X	--	--	150'	14'	2'x12'	Construct 150+-foot long raised trail by elevating existing ground level approximately 18 inches. Install double box culvert.
12	1F	River crossing South of Rancho Drive	SD	--	--	X	--	10'	4'	--	Construct puncheon crossing.
13	1F	River crossing South of Rancho Drive	SD	--	--	X	--	20'	4'	--	Construct puncheon crossing.
14	1F	Poggi Creek crossing	SD	--	--	--	X	60'	13'	--	Pile supported foundation required. Design to 8,000 lb. vehicle load. Pedestrian railing required.

Notes:
SD = San Diego
CV = Chula Vista

Revegetation of construction areas

Small cut and fill slopes resulting from the construction of trail segments 1C, 4, 6a, 6b, and 11, and unvegetated areas adjacent to all staging areas will be hydroseeded with seed mixes compatible with existing vegetation in the surrounding area. Tables 4 and 5 list the seed mixes to be used in upland and riparian areas.

Table 4			
Upland and Diegan Coastal Sage Scrub Hydroseed Mix¹			
Species	Unit Type	Lbs/Acre	PLS²
<i>Artemisia Californica</i> California sagebrush	Seed	2	15/50
<i>Simmondsia Chinesis</i> Jojoba	Seed	2	90/70
<i>Erigonum Fasciculatum</i> Flat-top buckwheat	Seed	2	10/65
<i>Lotus Scoparius Scoparius</i> Coastal deerweed	Seed	4	90/60
<i>Nassella lepida</i> Foothill needlegrass	Seed	1	60/60
<i>Viguiera Lacinata</i> San Diego county viguiera	Seed	1	60/60
Total lbs per acre		17	
Notes: 1 – Use at staging areas #1, #2, #3, #4, #5, #6, and #7, and on trail segments 1C, 6A, and 11 slopes. 2 - PLS (% Pure live seed) = % germinate X % purity or hydroseeded where appropriate, Source: Kimley-Horn & Associates, Inc. <i>Landscape Plans</i> , February 8, 2006.			

Table 5			
Southern Willow Scrub Hydroseed Mix¹			
Species	Unit Type	Lbs/Acre	PLS²
<i>Salix exigua</i> Narrow-leaved willow	Seed	2.5	15/50
<i>Salix lasolepsi</i> Arroyo willow	Seed	5.5	90/70
<i>Salix gooddingii</i> Goodding's black willow	Seed	1	10/65
<i>Platanus racemosa</i> California sycamore	Seed	0.5	90/60
<i>Salix lucida</i> Lance-leaf willow	Seed	3	60/60
Total lbs per acre		12.5	
Notes: 1 – Use on trail segments 4 and 6B slopes. 2 - PLS (% Pure live seed) = % germinate X % purity or hydroseeded where appropriate, Source: Kimley-Horn & Associates, Inc. <i>Landscape Plans</i> , February 8, 2006.			

Conceptual Mitigation Plan

A *Conceptual Mitigation Plan* has been prepared by Merkel & Associates to address all habitat-based mitigation required for the development of the proposed OVRP trail proposed project. The primary goal of conceptual mitigation plan is to create, restore, and enhance upland and wetland habitat that would persist in perpetuity and be self-supporting to mitigate impacts to below significant. Implementation of this plan would increase native riparian and upland habitat acreage within the Otay River Valley and improve the overall function and values of the existing wetlands. The *Conceptual Mitigation Plan* provides the conceptual plans necessary to mitigate the impacts to both upland and wetland resources incurred by the proposed project. Site preparation methods, planting designs, revegetation materials, as well as maintenance and monitoring specifications are included in this mitigation plan and are designed to follow the guidelines of the *Draft OVRP Habitat Restoration Plan* (February 2006).

Western Otay Valley Regional Park Natural Resource Management Plan (WOVRP NRMP)

The City of San Diego is responsible for the maintenance and management of the western portion of the OVRP. Maintenance shall be based on the requirements of the draft Western OVRP Natural Resource Management Plan and any additional maintenance notes on the conceptual revegetation plan (e.g. removal of trash, litter, and manure from the trails and staging (parking) areas). If any maintenance activity required for the *Otay Valley Regional Park (OVRP) Trails Plan* would adversely impact natural and/or cultural resources, mitigation will be implemented outlined in the Mitigation Options and Guidelines chapter (Chapter 8) of the NRMP. Maintenance will include the following:

- a. Trail maintenance will be initiated by Park Rangers and coordinated with biologists and/or archaeologists, as necessary. Trails will be regularly evaluated for soil erosion and impacts to sensitive species/habitat.
- b. All applicable permits will be obtained prior to conducting any maintenance activity.
- c. Maintenance activity sites will be surveyed by a qualified biologist to determine if biological resources are present. If impacts to sensitive resources would result, the maintenance area will be flagged to aid maintenance personnel in keeping the impact confined to the work area.
- d. An evaluation of archaeological maps and site checks for archaeological resources will be conducted by a qualified cultural resource specialist. If the potential for impacts exist, the site will be flagged to aid maintenance personnel in keeping the impact confined to the work area.
- e. All maintenance activities shall implement City of San Diego Storm Water Pollution Prevention best management practices.
- f. All trails, fences, and gates will be maintained in good repair and replaced as needed.
- g. Poison oak, stinging nettle, and other native human nuisance plant species should be controlled only around highly-used public areas, such as restrooms, trails, parking lots, historic points of interest, and interpretive displays. In other areas they should be allowed to remain as part of the natural system.

- h. Equestrian trails should be cleaned of litter, manure, and pet feces frequently using manual methods by City staff or other designated groups.
 - i. Brush management activities within the WOVRP should be done in accordance with the *City of San Diego MSCP Subarea Plan*, City of San Diego Municipal Code 142.0412 Brush Management and Section 7.4.4 of the *City of Chula Vista's MSCP Subarea Plan*, and is subject to the provisions of the City of Chula Vista's Habitat Loss and Incidental Take (HLIT) Ordinance.
 - j. All thinning or brush removal must occur outside the breeding/nesting season. Removal should be done by selective pruning, leaving various amounts of native plant understory. Prior to removal, a qualified biologist should survey the area for sensitive species and flag any areas to be avoided.
 - k. Trash receptacles will be covered at all times and shall be emptied on a regular basis.
8. Surrounding land uses and setting (Briefly describe the project's surroundings):

Land Use Within the OVRP

Mining operations in Otay River Valley include two batch plant operations. One batch plant is located in the river channel between Hollister Street and Beyer Boulevard. This plant is surrounded by heavily vegetated land on the north, east, and west, and agriculture on the south. The second plant is east of Beyer Boulevard and north of the river channel. This plant is surrounded by field crops on the north, heavily vegetated land on the east and south, and Beyer Boulevard on the west.

Numerous utility easements cross the Otay Valley in a north-south alignment as well as traversing the length of the valley. These easements include: above ground transmission lines and underground natural gas lines (Sempra); sewer and water lines at various locations (City of San Diego); water lines crossing the valley west of I-805 (California American Water Company); and a 100-foot wide right-of-way along Hollister Street (San Diego & Arizona Eastern Railroad).

Agricultural activities are limited to three locations within the proposed project area. Active nurseries are located north of Hollister Pond between I-5 and Hollister Street and north of the trolley station east of Hollister and south of the river. Active strawberry fields are located south of Main Street and west of Beyer Way.

A few residences are located west of Beyer Boulevard. Commercial recreational facilities located in the proposed project area include a go-kart track and a driving range located south of Fenton Pond, between I-5 and Hollister Street. Passive recreational activities include fishing, hiking, dog-walking, and bicycling. Two major, informal pedestrian trails traverse the valley east to west, along each side of the river channel. Minor trails are located along the north to south edges of the valley and as connections between the major trail routes. There are many pedestrian access points along the valley, especially where the residential areas or roadways abut the edge of the valley.

Several biological mitigation sites are also present within the proposed project area (see Attachment A, Figures 8a and 8b). None of the trail segments cross

these mitigation sites. The 6.86-acre California Multimodal Incorporated (CMI) Wetland Mitigation Site, located south of Faivre Street, has been dedicated to the City of San Diego as mitigation for a private development impact. There are no trails in the vicinity of this mitigation site. The Beyer Way Wetland Mitigation Area is located along both sides of the Beyer Way Bridge over the Otay River provides mitigation for impacts related to building the bridge. The exact location of this mitigation site is not known but the proposed project avoids southern willow scrub in this area. The Telegraph Canyon Creek Mitigation Sites, located west of I-805, are avoided by the proposed project. The South San Diego Mitigation Site is an upland mitigation site, located adjacent to an existing road and SDG&E easement that has been incorporated into the proposed trail system. No further information concerning existing mitigation sites could be found.

Table 6 summarizes land uses within, and adjacent, to the OVRP.

Table 6 Land Uses			
Area	Within OVRP	North of OVRP	South of OVRP
San Diego Bay to I-5	Extractive (Salt Ponds) Field Crops Vacant Lands	Extractive (Salt Ponds) Railroad Right-of-Way Swiss Park	Industrial Park Single-Family Housing Multi-family Housing Mobile Home Park Community Shopping Center Retail Trade
I-5 to Hollister St. (Railroad ROW)	Spaced Rural Residential Field Crops Vacant/Undeveloped Commercial Recreation	Industrial Park	Single-family Housing Retail Trade
Hollister St. To Beyer Blvd.	Vacant/Undeveloped Extractive (Batch Plant) Field Crops Pond	Industrial Park Warehousing/Public Storage Vacant/Undeveloped	Field Crops Transit Station Mobile Home Park Single-family Residential Vacant
Beyer Blvd. to Beyer Way	Extractive (Batch Plant) Field Corps Vacant/Undeveloped	Industrial Park Warehousing/Public Storage Single-family Residential	Single-family Housing Montgomery High School
Beyer Way To I-805	Vacant & Industrial Single-family Resident (near Date Street) Spaced Rural Resident (near Rios Ave.) Elementary School (Rickenbacker Avenue)	Beyer Way to Mace Street Industrial Park Single-family Residential Mace Street to Date Street Industrial Park Warehousing/Public Storage Single-family Residential Date Street to I-805 Single-family Housing Multi-family Housing	Beyer Way To Piccard Ave. Single-family Housing Piccard Ave. to Delcardo Ave. Single-family Housing Elementary School Delcardo Avenue to I-805 Single-family Housing Multi-family Housing

Land Uses Adjacent to the OVRP Area

Residential development along Palm Avenue is the predominate land use along the southern OVRP boundary from the western boundary to I-805. Vacant lands, public uses, and small commercial centers are interspersed within the residential development.

Land use along the northern OVRP boundary between I-5 and Date Street is predominantly industrial. Industrial parks are also located between I-5 and Beyer

Way. These parks include enclosed warehouses, public storage, and outdoor storage areas. Industrial uses between Beyer Way and Date Street include outdoor storage areas, a few enclosed warehouse storage areas, and auto-dismantling facilities. Along the northern OVRP boundary west of I-805, residential uses are limited to three areas. The largest area is located south of Main Street between Date Street and I-805. A smaller residential development is located just south of Main Street and east of Beyer Way. The third residential area is north of Main Street on both sides of Fourth Avenue.

At the western end of the OVRP the federal South Bay Wildlife Refuge is under the management of the U.S. Fish and Wildlife Service (USFWS). An unused railroad right-of-way to the northwest of the refuge is being considered for use as the Bayshore Bikeway. Additional uses to the south of the river, west of I-5, include a Home Depot and a mobile home park.

9. Public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

<u>Permit Type/Action</u>	<u>Agency</u>
Adoption of Mitigated Negative Declaration	County of San Diego Board of Supervisors
Site Development Permit	City of San Diego
No Rise Certificate	City of Chula Vista
Grading Permit	City of Chula Vista & San Diego
Clearing and Grubbing Permit	City of Chula Vista
401 Permit - Water Quality Certification	Regional Water Quality Control Board (RWQCB)
Nationwide Permit	US Army Corps of Engineers (ACOE)
1602 – Streambed Alteration Agreement	CA Department of Fish and Game (CDFG)
Encroachment Permit	California Department of Transportation (Caltrans)
Coastal Development Permit	California Coastal Commission
Encroachment Permit	Metropolitan Transit District

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--------------------------------------------------------------------------|----------------------------------------------------------------------------------------|-------------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology & Soils |
| <input type="checkbox"/> Hazards & Haz. Materials | <input type="checkbox"/> Hydrology & Water Quality | <input type="checkbox"/> Land Use & Planning |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Population & Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Utilities & Service Systems | <input checked="" type="checkbox"/> Mandatory Findings of Significance | |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ On the basis of this Initial Study, the (FILL IN AGENCY) finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ On the basis of this Initial Study, the County of San Diego finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ On the basis of this Initial Study, the (FILL IN AGENCY) finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Signature

Renee Bahl

Printed Name

Date

Director, County of San Diego
Department of Parks and
Recreation

Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

Once the lead agency has determined that a particular physical impact may occur, and then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.

“Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

Earlier Analysis Used. Identify and state where they are available for review.

Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

Mitigation Measures. For effects that are “Less than Significant with Mitigation Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

The explanation of each issue should identify the significance criteria or threshold, if any, used to evaluate each question; and the mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS -- Would the project:

a) Have a substantial adverse effect on a scenic vista?

☐ Potentially Significant Impact☒ Less than Significant Impact☐ Potentially Significant Unless Mitigation Incorporated☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: Scenic vistas are singular vantage points that offer unobstructed views of valued viewsheds, including areas designated as official scenic vistas along major highways. The *Otay Mesa-Nestor Community Plan* identifies 7 view and access points (Palm Avenue Transit Center, Midway Baptist Church, Palm Avenue, Montgomery High School, Cochran Avenue, Finney Elementary School, and Murrieta Circle) along the rim of the bluff along the south side of the OVRP.

The proposed project is the construction of a hiking, biking, and equestrian trail system that includes 7 staging areas, a retaining wall with a maximum height of 6 feet, 14 wetland crossings, and 1 bridge at Poggi Creek between Saturn Boulevard on the west to I-805 on the east. The retaining wall will be constructed of concrete block that simulates adobe. The color of the blocks will be selected to blend with the natural landscape colors of the Otay River valley and bluffs. The proposed project is compatible with the existing visual environment in terms of visual character and quality for the following reasons: (1) construction of the staging areas and trails will not result in a substantial modification of the existing landform, substantial amounts of grading, or the creation of visually prominent cut and fill slopes, (2) no blockage of views would result from the construction of the trails, staging areas, walls, or drainage facilities, (3) the concrete block retaining wall required for the construction of trail segment 8 would have a maximum height of 6 feet, (4) the retaining wall will be located along side of, and below the elevation of the existing Beyer Boulevard; (5) the visibility of the retaining wall from major roadways or scenic overlooks would be obscured by existing vegetation in the OVRP, and (6) views of the Poggi Creek bridge from adjacent residential areas will be screened by native vegetation.

An analysis of the proposed project and the cumulatively related projects identified in Section XVII of this Initial Study concluded that the proposed project would not result in a cumulatively considerable impact because the cumulatively related projects do not involve substantial modification of the existing landforms or the blockage of views. Therefore, the proposed project will not result in any adverse project or cumulative level effect on a scenic vista.

- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: State scenic highways refer to those highways that are officially designated. A scenic highway is officially designated as a State scenic highway when the local jurisdiction adopts a scenic corridor protection program, applies to the California Department of Transportation for scenic highway approval, and receives notification from Caltrans that the highway has been designated as an official Scenic Highway. The State Scenic Highway Program has not designated any scenic routes within or adjacent to the OVRP. Consequently, the proposed project will not change the visual composition of an existing scenic resource within a State scenic highway.

- c) Substantially degrade the existing visual character or quality of the site and its surroundings?

- | | |
|---------------------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity and continuity. Visual quality is the viewer's perception of the visual environment and varies with exposure, sensitivity and expectation of the viewers. The existing visual character and quality of the Otay River Valley varies from mining operations between Hollister Street and Beyer Way to relatively undisturbed riparian vegetation communities between Beyer Way and I-805. The adjacent areas to the north include light industrial uses between I-5 and Date Street, and single-family residential between Date Street and I-805. Single-family residential is the predominant use along the bluff south of the valley. Two schools (Finney Elementary and Montgomery High School) are located at the edge of the bluff along the south side of the valley.

The proposed project is the construction of 7 staging areas and a hiking, biking, and equestrian trail system in the Otay River Valley between Saturn Boulevard and I-805. The proposed project is compatible with the existing visual character and quality of the area for the following reasons: (1) no view blockage would result from the construction of the project; (2) the majority of the trail system will be located within existing informal trails and utility easement roads; (3) the retaining wall for trail segment 8 will be located along side of, and below the elevation of the existing Beyer Boulevard; and (4) views of

the Poggi Creek bridge from adjacent residential areas will be screened by existing native vegetation that will remain.

The proposed project will not result in cumulative impacts on visual character or quality because the entire existing viewshed and a list of past, present and future projects within that viewshed were evaluated. Refer to XVII. Mandatory Findings of Significance for a comprehensive list of the projects considered. Those projects listed in Section XVII are located within the viewshed surrounding the proposed project and will not contribute to a cumulative impact for the following reasons: none of the cumulatively related projects will result in the construction of structures that would block existing views or be incompatible with the existing visual character of the area. Therefore, the proposed project will not result in any adverse project or cumulative level effect on visual character or quality on-site or in the surrounding area.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless
Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: The proposed project does not propose building materials with highly reflective properties such as highly reflective glass or high-gloss surface colors. The only outdoor lighting would be one parking lot light in the interior of Staging Area #4 which is necessary to enhance safety. This fixture would have a cut-off luminaire shield that directs light down on to the parking lot surface. Existing trees and shrubbery would screen this light from Beyer Boulevard. Single-family residences are located approximately 300 feet south of, and 100 feet above, the staging area. Existing trees and shrubbery within the staging area, and along the rear property line of the residences, will screen the residential views of the parking lot light. Therefore, the proposed project will not create any new sources of light pollution that could contribute to sky glow, light trespass or glare and adversely affect day or nighttime views in area.

II. AGRICULTURE RESOURCES -- In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the *California Agricultural Land Evaluation and Site Assessment Model* (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

- | | |
|---------------------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: Portions of valley (west of Beyer Boulevard) is designated as Prime Farmland. However, the construction of the proposed project would not have significant adverse project or cumulative level impacts related to the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use for the following reasons: (1) the majority of the trails would be located within the alignment of existing informal trails and utility access roads; (2) none of the existing agricultural uses in the valley would be displaced nor would future agricultural uses be precluded; and (3) use of the staging areas and trails would not adversely affect existing or future agricultural uses. Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance or Farmland of Local Importance to a non-agricultural use will occur as a result of this proposed project.

- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project site is zoned open space and residential, which are not considered to be agricultural zones. Additionally, none of the proposed project site is in a Williamson Act Contract. Therefore, the proposed project does not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

- c) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

☐ Potentially Significant Impact

☒ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The proposed project area contains land designated as prime farmland; however, the proposed project would not result in significant adverse impacts related to the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance or Farmland of Local Importance to a non-agricultural use for the following reasons: (1) the staging areas and trail system would be located outside of existing agricultural activities; (2) the majority of the trails would be located within the alignment of existing informal trails and utility access roads; (3) the majority of the staging areas are located in disturbed/ruderal habitat areas; (4) none of the existing agricultural uses in the valley would be displaced nor would future agricultural uses in the valley be precluded; and (5) use of the staging areas and trails would not adversely affect existing or future agricultural uses. Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use will occur as a result of this proposed project.

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

- a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Operation of the proposed project will not result in emissions of significant quantities of criteria pollutants listed in the *California Ambient Air Quality Standards* or toxic air contaminants as identified by the California Air Resources Board. The proposed project will provide mass transit access from the Palm Avenue trolley station for persons visiting the park from distant areas. Additionally the project will promote walking, bike riding, and equestrian activities instead of activities requiring auto use for residents in the surrounding area. Therefore, the proposed project will not conflict or obstruct with the implementation of the RAQS nor the SIP on a project or cumulative level.

- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

- | | |
|--------------------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

In general, air quality impacts from land use projects are the result of emissions from motor vehicles, and from short-term construction activities associated with such projects. The San Diego County Air Pollution Control District (SDAPCD) has established screening-level criteria for all new source review (NSR) in APCD Rule 20.2. For CEQA purposes, these screening-level criteria can be used as numeric methods to demonstrate that a project's total emissions (e.g. stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. Since APCD does not have screening-level criteria for emissions of volatile organic compounds (VOCs), the use of the screening level for reactive organic compounds (ROC) from the *CEQA Air Quality Handbook for the South Coast Air Basin* (SCAB), which has stricter standards for emissions of ROCs/VOCs than San Diego's, is appropriate.

The proposed project will promote walking, bike riding, and equestrian activities rather than activities requiring auto use for residents in the surrounding area. The traffic analysis completed for the proposed project indicates an increase in vehicular trips (288

ADT) would result from the proposed project (see Attachment D). The proposed project will also provide mass transit access from the Palm Avenue trolley station for persons visiting the park from distant areas. Consequently, the future use of the staging areas and trails would not emit substantial amounts of air pollution.

Potentially Significant Unless Mitigation Incorporated:

Air quality emissions associated with the proposed project include temporary emissions of PM₁₀, NO_x and VOCs from construction/grading activities. Grading operations associated with the construction of the proposed project would be subject to City of San Diego and City of Chula Vista Grading Ordinances, which require the implementation of dust control measures. However, grading activities would result in short-term emissions of PM₁₀, NO_x and VOCs.

Impact AQ-1. Construction activities required for the proposed project could result in significant short-term particulate impacts. The mitigation measure listed below would reduce these impacts to a less than significant level.

Mitigation Measure AQ-1. Prior to the issuance of the Notice to Proceed, the Assistant Deputy Director (ADD) environmental designee of the City of San Diego Land Development Review Division and the Senior Planner of the Mitigation Monitoring and Coordination (MMC) Program shall ensure the following air quality measure is shown on applicable grading and building plans as details, notes or as otherwise appropriate.

1. During construction, dirt and debris shall be washed down or swept up as soon as practicable to reduce the resuspension of particulate matter caused by vehicle movement over such material. Approach routes to the construction area shall be cleaned of construction-related dirt and debris as needed.
2. In accordance with California Vehicle Code Section 23114, vehicles transporting loads of aggregate materials must cover/tarp the material, or if not covered, the material must be no nearer than six inches from the upper edge of the container area where the material contacts the sides, front, and back of the cargo container area, and the load shall not extend, at its peak, above any part of the upper edge of the cargo container area. This measure shall also apply to the transport of any materials associated with demolition, grading, or building activities that can potentially become airborne.
3. Construction equipment shall be maintained in proper working order and shall be periodically tuned in order to minimize air pollutant emissions; use of low pollutant-emitting construction equipment, including electrical-powered equipment, shall be used as practical.
4. All unpaved construction areas shall be sprinkled with water or other acceptable dust control agents during dust-generating activities as necessary to minimize dust emissions to the maximum extent practicable. Additional watering or dust control agents shall be applied during dry weather or on windy days until dust emissions are not visible.
5. In addition, the following air quality mitigation requirements shall also be shown on all applicable grading, and building plans as details, notes, or as otherwise appropriate, and shall not be deviated from unless approved in advance in writing by

the City of San Diego MMC if it is a city project or the County's Environmental Review Coordinator if it is a county project:

- Use low pollutant-emitting construction equipment.
- Use electrical construction equipment as practical.
- Use catalytic reduction for gasoline-powered equipment.
- Water the construction area as needed to minimize fugitive dust.
- Stabilize graded areas as quickly as possible to minimize fugitive dust.
- Pave permanent roads as quickly as possible to minimize dust.
- Use electricity from power poles instead of temporary generators during building, if available.
- Minimize tracking on to public streets.
- Project to comply with the Clean Water Act and implement Best Management Practices.

- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

☐ Potentially Significant Impact

☒ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

San Diego County is presently in non-attainment for the 1-hour concentrations under the California Ambient Air Quality Standard (CAAQS) for Ozone (O_3). San Diego County is also in non-attainment for the annual geometric mean and for the 24-hour concentrations of Particulate Matter less than or equal to 10 microns (PM_{10}) under the CAAQS. O_3 is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM_{10} in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Less Than Significant Impact:

Air quality emissions of PM_{10} , NO_x and VOCs resulting from construction activities would be reduced to a less than significant level through the implementation of the above listed Mitigation Measure AQ-1.

The vehicle trips generated by the proposed project will result in 288 Average Daily Trips (ADTs). According to the Bay Area Air Quality Management District CEQA Guidelines for Assessing the Air Quality Impacts of Projects and Plans, projects that generate less than 2,000 ADT are below the Screening-Level Criteria established by SDAPCD Rule 20.2 and by the *SCAQMD CEQA Air Quality Handbook* section 6.2 and

6.3 for VOCs and PM₁₀. Given that short-term emissions resulting from grading activities will be substantially reduced through the implementation of Mitigation Measure AQ-1 and that the proposed project is anticipated to generate only 288 ADT, emissions associated with the proposed project are not expected to create a cumulatively considerable impact nor a considerable net increase of PM₁₀, or any O₃ precursors.

d) Expose sensitive receptors to substantial pollutant concentrations?

- | | |
|---------------------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Air quality regulations typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality.

Less Than Significant Impact: The following sensitive receptors have been identified within a quarter-mile (the radius determined by the SCAQMD in which the dilution of pollutants is typically significant) of the proposed project: Montgomery High School and Myrtle S. Finney Elementary School. However, this proposed project does not propose uses or activities that would result in exposure of these identified sensitive receptors to significant pollutant concentrations. In addition, the proposed project will not contribute to a cumulatively considerable exposure of sensitive receptors to substantial pollutant concentrations because the proposed project as well as the listed projects have emissions below the screening-level criteria established by SDAPCD Rule 20.2 and by the SCAQMD CEQA Air Quality Handbook section 6.2 and 6.3.

e) Create objectionable odors affecting a substantial number of people?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: No potential sources of objectionable odors have been identified in association with the proposed project. As such, no impact from odors is anticipated.

IV. BIOLOGICAL RESOURCES -- Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☒ Potentially Significant Unless Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Vegetation communities identified within the OVRP include non-native vegetation, disturbed wetland, disturbed/ruderal lands, urban/developed, open water/freshwater, general agriculture, Diegan coastal sage scrub, disturbed Diegan coastal sage scrub, non-native grassland, cismontane alkali marsh, coastal and valley freshwater marsh, emergent wetland, mule fat scrub, southern willow scrub, and southern cottonwood willow riparian scrub. Southern willow scrub habitat, intermixed with mule fat scrub, occurs along the river. Areas of cismontane alkali marsh, coastal and valley freshwater marsh, and open water are scattered throughout the OVRP. The upland habitat around the riparian is predominantly Diegan coastal sage scrub. This habitat type also occurs in the drier areas within the riparian habitat. In many locations there are areas of disturbed/ruderal lands, non-native grassland, and eucalyptus non-native vegetation that occur between the coastal sage scrub and urban development, particularly on the north side of the river. Numerous invasive species, such as giant reed (*Arundo donax*) and Pampas grass (*Cortaderia jubata*), are interspersed with the native habitat.

Nine sensitive plant species have been identified within the project area and 4 of these, San Diego marsh elder (*Iva hayesiana*), southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*), Orcutt's bird's-beak (*Cordylanthus orcuttianus*), and ashy spike-moss (*Selaginella cinerascens*), occur extensively along the proposed trail segments. Other sensitive floral species identified on-site include San Diego County viguiera (*Viguiera laciniata*), Palmer's goldenbush (*Ericameria palmeri* var. *palmeri*), California adolphia (*Adolphia californica*), San Diego barrel cactus (*Ferocactus viridescens*), and snake cholla (*Cylindropuntia californica* var. *parkeri*). All of the 9 recorded sensitive species occur within the City of San Diego and 4 of them occur within the City of Chula Vista. The species within the City of Chula Vista jurisdiction include: Orcutt's bird's-beak, Palmer's goldenbush, San Diego marsh elder, and southwestern spiny rush. Two narrow endemic species were identified (Palmer's goldenbush and snake cholla) within the project area.

Two listed avian species occurs on-site - coastal California gnatcatcher and least Bell's vireo. One breeding pair of gnatcatchers and 3 independent juveniles were identified in the coastal sage scrub. Twelve least Bell's vireo territories were identified on-site. No southwestern willow flycatchers were recorded on-site.

Six butterfly species were identified in sage scrub habitat including western tiger swallowtail (*Papilio rutulus*), Sara orangetip (*Anthocharis sara sara*), Edward's blue

(*Hemiargus ceraunus gyas*), mourning cloak (*Nymphalis antiopa*), painted lady (*Vanessa cardui*), and queen (*Danaus gilippus*). The OVRP is not within the Quino Survey Area as defined by the U.S. Fish and Wildlife Service, and the federally endangered Quino checkerspot butterfly (*Euphydryas editha quino*), does not exist within the project area, although it exists elsewhere in the Otay River Valley. The host plants of the Quino checkerspot butterfly (*Plantago erecta* and *P. patagonica*) are not found within the OVRP.

The pacific treefrog (*Pseudacris regilla*) and bullfrog (*Rana catesbeiana*) were the only amphibians identified in the open water. Crayfish (*Orconectes virilis*) occur within the Otay River and this may limit the number of amphibians within the system. The ponds also have potential for southern Pacific pond turtle (*Emys marmorata pallida*) and non-native turtles, such as the red-eared slider (*Trachemys scripta elegans*).

The western fence lizard (*Sceloporus occidentalis*) was the only reptile observed in both Diegan coastal sage scrub and non-native grassland. Species such as orange-throat whiptail (*Aspidoscelis hyperythra*), San Diego horned lizard (*Phrynosoma coronatum blainvillii*), and San Diego alligator lizard (*Elgaria multicarinata webbia*) may also utilize the sage scrub and grasslands.

Trail routes for the proposed project were selected to avoid and minimize potential impacts to streambeds and sensitive vegetation to the maximum extent practicable. In locations where trails were to be located near the transition between upland vegetation and wetlands, the trails were located in the upland vegetation. Existing trails within the OVRP are incorporated into the project wherever possible, and existing trail segments not incorporated into the proposed project would be closed by physical barriers such as boulders or signage to prevent future use that could result in impacts to biological resources.

The following design measures will be implemented prior to, and during, construction to avoid and minimize biological resource impacts.

- Prior to the start of construction, all construction and staging area limits shall be clearly delineated with orange construction fencing to ensure that construction activity remains within the defined construction limits. A qualified biologist shall inspect the fencing prior to the start of construction and shall monitor activities during construction to avoid unauthorized impacts.
- During construction, all construction activities including equipment storage, equipment cleaning, stock piling, etc. shall occur within the delineated orange construction fence area. All staging areas shall be located as shown on plans. All staging areas shall be located in existing disturbed or developed areas and outside of the MHPA as delineated on the maps in the *City of San Diego MSCP Subarea Plan*, and outside of the PMA as delineated on the maps in the *City of Chula Vista MSCP Subarea Plan*, and drainage areas. All equipment and/or materials related to construction shall be stored in designated and properly maintained staging areas. The location of the staging areas shall be reviewed and approved by the decision-making bodies. A responsible party (e.g. construction manager, resident engineer)

shall be identified to ensure that all construction crews and/or field workers comply with these measures.

- Natural drainage patterns shall be maintained to the extent practicable during construction. Erosion control techniques, including the use of sandbags, hay bales, and/or the installation of sediment traps, shall be used to control erosion and deter drainage during construction activities into the adjacent open space.
- Drainage from all development areas adjacent to the MHPA and PMA shall be directed away from the MHPA and PMA. If this is not possible in some locations, drainage shall be directed to sedimentation basins, grassy swales, and/or mechanical trapping devices as specified by the construction manager. Silty turbid water shall be settled, filtered, or otherwise clarified prior to discharge.
- Best Management Practices (BMPs) shall be implemented during construction activities which include, but are not limited to, storm drain inlet protection, stabilized construction entrance/exit areas, and silt fencing. Silt fences and fiber rolls shall be used to minimize surface transport of sediments. The construction contractor will be required to prepare and implement a *Stormwater Pollution Prevention Plan* (SWPPP). The implementation of BMPs as stated in the contract documents in accordance with the City of San Diego's and the City of Chula Vista's Stormwater Regulations would reduce water quality impacts to below level of significance.
- To prevent potential dust damage to vegetation in the conserved habitat, spraying of the construction site with clean water shall be conducted on an as-needed basis.

The proposed project would result in direct and indirect impacts to sensitive biological resources within the project area. These impacts would result from the widening of existing trails, the construction of new trails and staging areas, wetland crossings, and a bridge. Sensitive flora that would be impacted include San Diego marsh elder, southwester spiny rush, and San Diego barrel cactus. The impacts would occur within coastal sage scrub, non-native grassland, disturbed wetland, open water/freshwater, mule fat scrub, southern willow scrub, and cismontane alkali marsh. Impacts to least Bell's vireo, coastal California gnatcatcher, light-footed clapper rail, Cooper's hawk and red-shoulder hawk would be avoided by constructing the proposed project outside of the breeding season. If for some reason construction would need to occur during the breeding season, the mitigation measures listed below would reduce potential impacts to a less than significant level.

The design of the proposed project avoids all impacts to California adolphia, San Diego County viguiera, and ashy spike-moss. The proposed project design also avoids impacts to the narrow endemic species (Palmer's goldenbush, and snake cholla) found within the OVRP. None of the existing mitigation sites within the project area would be impacted because the proposed trails are located outside of the existing mitigation sites.

Impacts to Orcutt's bird's-beak have been avoided by placing peeler log fencing along the edges of an existing graded utility easement containing trail segments 1E and 1F, and by routing trail segment 1E away from a major population of this species. Trail segment 1E1 would be located within an existing 2 to 4-foot existing trail that traverses a population of Orcutt's bird's-beak. Interpretative signage identifying and giving the life history of the Orcutt's bird's beak would be placed at each end of trail segment 1E1 to educate trail users of the importance of staying on the trail.

Potentially Significant Unless Mitigation Incorporated:**Sensitive Flora Direct Impacts:**

Impact BR-1. San Diego marsh elder and southwestern spiny rush occur in large numbers within the OVRP (see Figures 7a and 7b in Attachment A). Construction of the trail system would directly impact approximately 400 marsh elder and 400 spiny rush plants. This impact represents 17% and 57%, respectively, of the on-site populations.

Impact BR-2. The population of San Diego barrel cactus is substantial in the valley, with over 400 individuals near the proposed trail alignments. Although a portion of the Finney School trail (segment 11) has been located away from the main population, a few individual cacti could be impacted.

Sensitive Flora Mitigation:

Mitigation Measure BR-1. Mitigation of San Diego marsh elder and southwestern spiny rush will occur as part of the wetland mitigation program described in the mitigation measures BR-10, BR-11a, and BR-11b.

Mitigation Measure BR-2. Mitigation of the San Diego barrel cactus will occur by locating the Finney School trail (segment 11) a minimum of 10 feet away from concentrations of this species to protect them from edge effects and unauthorized collection. A peeler log fence would be placed along the trail to prevent hikers from walking off the trail into the area containing barrel cactus. Where individual plants cannot be avoided, they will be transplanted by a qualified biologist to an area containing appropriate vegetation and orientation.

Sensitive Fauna Impacts:

Impact BR-3. The federally endangered least Bell's vireo occupies the riparian habitat throughout the proposed project area (see Figures 8a and 8b in the *Otay Valley Regional Park Trails Project Biological Impact Analysis Report*). The breeding period for this species is March 15 through September 15. Impacts to southern willow scrub and mule fat scrub would directly impact this species through habitat loss, even though the amount of riparian habitat impacted will be minimal and the remaining habitat would accommodate the current 12 vireo territories.

Impact BR-4. Removal of 1.70 acres of occupied Diegan coastal sage scrub will directly impact the federally threatened coastal California gnatcatcher. There is at least one breeding pair of gnatcatchers on-site. The breeding period for this species is designated as February 15 through August 15.

Impact BR-5. There is a high potential for the federally endangered light-footed clapper rail to occur west of Beyer Way along the Otay River and the ponds located within the proposed project area. The breeding period for this species is March 1 to August 1. No direct long-term impacts would occur to the ponds and their surrounding freshwater marsh, which could be used for breeding by this species. However, construction of the trail system including the improvement of 3 wetland crossings west of Beyer Way could

result in temporary short-term impacts to the light-footed clapper rail during the construction period by impeding movement of the clapper rail to potential breeding habitat such as freshwater marsh.

Impact BR-6. Two raptor species, Cooper's hawk and red-shouldered hawk, were observed nesting in the eucalyptus woodlands located within the project area. The breeding season for hawks is January 15 through July 31. Construction activity resulting in the loss of the eucalyptus woodlands during the breeding period would directly impact these species.

Sensitive Fauna Mitigation:

Mitigation Measure BR-3. Prior to the issuance of any grading permit, the City of San Diego Representatives (or appointed designee) shall verify that the following project requirements regarding the least Bell's vireo are shown on the grading plans.

No clearing, grubbing, grading, or other construction activities shall occur between March 15 and September 15, the breeding season of the least Bell's vireo, until the following requirements have been met to the satisfaction of the City Representatives.

1. A qualified biologist (possessing a valid Endangered Species Act Section 10(a)(1)(A) Recovery Permit) shall survey those riparian areas that would be subject to construction noise levels exceeding 60 decibels [dB(A)] hourly average for the presence of the least Bell's vireo. If least Bell's vireo are present, the following conditions must be met:
 - a. Between March 15 and September 15, no clearing, grubbing, or grading of occupied riparian habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist, and
 - b. Between March 15 and September 15, no construction activities shall occur within any portion of the site where construction would result in noise levels exceeding 60 dB(A) hourly average at the edge of occupied least Bell's vireo habitat. An analysis showing that noise generated by construction activities would not exceed 60 dB(A) hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the City Representatives at least two weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; or
 - c. At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(A) hourly average at the edge of habitat occupied by the least Bell's vireo. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dB(A) hourly average. If the noise attenuation techniques implemented are determined to be inadequate

by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16).

* Construction noise shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Representatives, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

2. If least Bell's vireo are not detected during the survey, the qualified biologist shall submit substantial evidence to the City Representatives and applicable resource agencies which demonstrates whether or not mitigation measures such as noise walls are necessary between March 15 and September 15 as follows:
 - a. If this evidence indicates the potential is high for least Bell's vireo to be present based on historical records or site conditions, then condition 1.c shall be adhered to as specified above.
 - b. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

Impacts to the least Bell's vireo will be avoided by constructing the project outside of the breeding season. This measure is applicable (and necessary) if construction were to occur during the breeding season.

Mitigation Measure BR-4. Prior to the issuance of any grading permit the City of San Diego Representatives (or appointed designee) shall verify that the Multi-Habitat Planning Area (MHPA) and Preserve Management Area (PMA) boundaries and the following project requirements regarding the coastal California gnatcatcher are shown on the grading plans.

No clearing, grubbing, grading, or other construction activities shall occur between February 15 and August 15, the breeding season of the coastal California gnatcatcher, until the following requirements have been met to the satisfaction of the City of San Diego or County of San Diego Representatives:

1. A qualified biologist (possessing a valid Endangered Species Act Section 10(a)(1)(A) Recovery Permit) shall survey any Diegan coastal sage scrub within the MHPA or PMA that would be subject to construction noise levels exceeding 60 decibels [dB(A)] hourly average for the presence of the coastal California gnatcatcher. If gnatcatchers are present, the following conditions must be met:
 - a. During the coastal California gnatcatcher breeding season, no clearing, grubbing, or grading of occupied gnatcatcher habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist, and
 - b. During the coastal California gnatcatcher breeding season, no construction activities shall occur within any portion of the site where construction would result

in noise levels exceeding 60 dB(A) hourly average at the edge of occupied gnatcatcher habitat. An analysis showing that noise generated by construction activities would not exceed 60 dB(A) hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the City Manager at least two weeks prior to the commencement of construction activities. Prior to the commencement or continuation of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; or

- c. At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(A) hourly average at the edge of habitat occupied by the coastal California gnatcatcher. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dB(A) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, adequate noise attenuation is achieved or until the end of the breeding season (August 15).

* Construction noise shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Representatives, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

2. If coastal California gnatcatchers are not detected during the survey, the qualified biologist shall submit substantial evidence to the City Representatives and applicable resource agencies which demonstrates whether or not mitigation measures such as noise walls are necessary during the coastal California gnatcatcher breeding season as follows:
 - a. If this evidence indicates the potential is high for coastal California gnatcatcher to be present based on historical records or site conditions, then condition 1.c shall be adhered to as specified above.
 - b. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

Impacts to the coastal California gnatcatchers will be avoided by constructing the project outside of the breeding season. This measure is applicable (and necessary) if for construction were to occur during the breeding season.

Mitigation Measure BR-5. Trail construction activities involving new crossings of the Otay River west of Beyer Way shall occur outside of the breeding period of the light-footed clapper rail (March 1 to August 1). Prohibiting construction during the breeding season would avoid impacts to the light-footed clapper rail.

Mitigation Measure BR-6. If removal of any trees within the development area is proposed during the raptor breeding season (January 15 to September 15) the biologist shall ensure that no raptors are nesting in such trees. If construction occurs during the raptor breeding season a preconstruction survey would be conducted and no construction would occur within 500 feet of any identified nest(s) until the young fledge. Impacts to raptors will be avoided by constructing the project outside of the breeding season. This measure is applicable (and necessary) if construction were to occur during the breeding season.

Significant Indirect Impacts

Indirect impacts to sensitive habitats and species could result from several activities associated with the use of the trails proposed for the OVRP. The potential indirect impacts are:

Impact BR-7a (Cowbird Parasitism). A single brown-headed cowbird was observed during protocol surveys of the project area. Use of the trail east of I-805 by equestrians has the potential to increase the brown-headed cowbird population because this species forages on seeds found in the fecal matter of animals. An increased cowbird population would cause an indirect impact to the reproductive success of some avian species as a result of increased nest predation due to brood parasitism.

Impact BR-7b (Animal Waste & Littering) Horse urine and manure may have an adverse affect on water quality in the form of pathogens and increased nutrients that cause algal blooms. Flooding of some of the low-lying trails may compound this problem by causing seasonal flushing during the rainy season. The use of the proposed OVRP trail system by hikers and equestrians on a regular basis would most likely increase the incidence of litter/dumping.

Impact BR-7c (Invasion of Non-native Plant Species) Horse manure may contain viable seeds of exotic species and may be a dispersal mechanism for some exotic species, particularly non-native grasses. For example, horses may potentially spread camelthorn (*Alhagi pseudalhagi*), an invasive plant species that is found to contaminate seed bags of alfalfa, along trails in wildlands similar to the proposed project.

Impact BR-7d (Off-trail Intrusion) Use of the trail system by hikers, bicyclists, and equestrians may result in disturbance and destruction of native vegetation adjacent to the trails. Impacts may include crushing/breaking off of plants, increased incidence of unauthorized plant collection, horses foraging on native wildflowers, etc.

Indirect Impacts Mitigation

Mitigation Measure BR-7a. A qualified biologist shall develop a cowbird trapping program to include a threshold for management action and shall periodically survey the

proposed project area to determine if the cowbird population increases. This would be done annually for the first 3-5 years that the trail system is open for equestrian use. After the first 5 years, the cities of San Diego and Chula Vista will review the data and prepare a new plan, if an increase in cowbird population is determined. If an increase occurs, an appropriate cowbird trapping management plan shall be implemented. If there is no increase in cowbird population, monitoring would continue only if there is an increase in equestrian use over time. Responsibility for cowbird monitoring and trapping is identified in the OVRP JEPA. Annual monitoring reports should be submitted to the County of San Diego, the City of San Diego Development Services Division Mitigation and Monitoring Coordination Section, and the City of Chula Vista Environmental Review Coordinator.

Mitigation Measure BR-7b. A *Trails and Staging Area Maintenance Plan* shall be implemented under the authority of the adopted *Joint Exercise of Powers Agreement* (JEPA) for the Otay Valley Regional Park (OVRP). The City of San Diego is responsible for the maintenance and management of the OVRP as indicated in the JEPA agreement. The maintenance shall comply with the requirements of the *Western OVRP Natural Resource Management Plan* and additional maintenance notes indicated on the draft conceptual plans (e.g. removal of trash, litter, and manure from the trails and staging areas).

Mitigation Measure BR-7c. The *MSCP Subarea Plans* for the cities of San Diego and Chula Vista requires the cities to engage in a coordinated effort to produce a long-term, invasive non-native plant removal program. The on-going maintenance program for the OVRP trail system is the responsibility of the City of San Diego. The program will include the removal of manure prior to, and during, the rainy season to eliminate the introduction of non-native plant species from equestrian sources. In addition, signage will be placed at staging areas and trailheads east of Beyer Way with the following wording, "Please feed your horses weed free feed for at least 48 hours prior to entering the park." In addition, in some areas interpretative materials would be posted explaining that feeding horses weed free feed minimizes the likelihood of spreading weeds in the park.

Mitigation Measure BR-7d. Enforcement actions shall be taken to prevent and remove illegal intrusions, off-road vehicle activity, and illegal plant harvesting in the City of Chula Vista Preserve on an annual basis, as well as on a complaint basis.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☒ Potentially Significant Unless
Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Selection of the trail routes sought to avoid and minimize vegetation community impacts to the greatest extent practicable (see Figures 9a, 9b, and 9c in Attachment A). Existing informal trails and utility roads were utilized whenever possible to minimize impacts to native vegetation. Minimization of impacts also resulted from minimizing the buffer width on both sides of the trail system. To limit vegetation community impacts in highly sensitive areas, Type “2” trails with a 0.5-foot buffer is proposed for several trail segments (see Table 1). In some areas, a peeler log fence will be installed to prevent further trampling and off-trail use in areas of sensitive plant species. This fence would be as unobtrusive as possible and allow for the sunlight to access the plants. A portion of trail segment 11 (850 feet) extends from the valley floor up the slope to Finney School is proposed as a Type “3” trail. This trail will have a tread width of 4 feet and would be used for foot traffic only. Trail segment 1E1 that traverses the area containing Orcutt’s bird-beak is proposed as a Type “4” trail.

Potentially Significant Unless Mitigation Incorporated

Upland Habitat Impacts:

Construction of the proposed project will result in significant impacts to Diegan coastal sage scrub and non-native grassland. These impacts would result from the widening of existing trails and the creation of new trails. Figures 9a, 9b, and 9c (see Attachment A) illustrate the location of permanent and temporary impacts. As shown in the figures, impacts to the vegetation communities occur where segments of the trail system could not be routed around sensitive habitats. The majority of the upland habitat impacts are non-native vegetation, disturbed / ruderal land, and general agriculture impacts. Impacts to upland (12.29 acres) and wetland habitats (0.88 acres) resulting from the trail system are summarized in the Table 7. Approximately 71% of the impacts occur to disturbed/ruderal lands. Only 2.33 acres of impact occur in coastal sage scrub or non-native grassland. As shown in Table 8, 10.53 acres (80%) of the impact (72% of which is disturbed/ruderal lands) occurs within the City of San Diego, and 2.64 acres (20%) of the impact (67% of which is disturbed/ruderal lands) occurs within the City of Chula Vista.

Impact BR-8. Construction of the proposed project will result in significant impacts to 1.57 acres of Diegan coastal sage scrub in the City of San Diego and 0.13 acre in the City of Chula Vista (see Table 8).

Impact BR-9. Construction of the proposed project will result in significant impacts to 0.04 acre of non-native grassland in the City of San Diego and 0.59 acre in the City of Chula Vista (see Table 8).

Sensitive Upland Habitat Mitigation

Table 9 identifies the impact acreage, mitigation ratios, and required mitigation acreages with the City of San Diego and the City of Chula Vista. As shown in Table 9, mitigation of upland impacts would be accomplished in two phases within the OVRP. Phase 1 includes mitigation for the construction of a portion of trail segment 1C, all of segments 1D and 5, and staging area #4 (see Attachment B, Figure 2).

Mitigation Measures BR-8: Phase 1 mitigation for Diegan coastal sage scrub mitigation consists of restoring 0.44 acres of a 2.4-acre ruderal habitat located immediately west of staging area 4 (see Table 10 and Attachment B, Figure 2).

Phase 2 mitigation for Diegan coastal sage scrub consists of restoring an additional 1.09 acres of the ruderal habitat located immediately west of staging area 4 (see Table 11). In addition, the Phase 2 mitigation includes closing and restoring 4 existing trails (see Table 11). Restoration of the 4 existing trails would reclaim 0.24-acre of habitat. Trail A is located in the City of Chula Vista PMA and Trails B, C, and D are located in the City of San Diego MHPA.

Mitigation Measure BR-9: No impacts to non-native grassland occur in Phase I. Therefore, no mitigation is necessary.

Phase 2 mitigation for non-native grassland will be mitigated by restoration of 0.63-acre of Diegan coastal sage scrub within the mitigation site adjacent to staging area #4. The reason for the up-tiering of mitigation is there are no continuous areas of non-native grassland within the project area that would increase foraging habitat for raptors. The areas that exist are mainly small city lots or areas that once contained Diegan coastal sage scrub but have been highly disturbed through human use. For these reasons, it is appropriate to mitigate for non-native grassland loss by replacing it out of kind with Diegan coastal sage scrub.

Table 7
Summary of Vegetation Community Impacts

Vegetation Community	MSCP Habitat Tier	Acres On-site	Acres Impacted On-site	Acres Impacted Off-site	Total acres Impacted	Biological Significance Determination
Uplands						
Diegan Coastal Sage Scrub ^a	Upland Tier II	179.72	1.70	0.00	1.70	Significant
Non-Native Grassland	Upland Tier IIIB	6.93	0.63	0.00	0.63	Significant
Non-native Vegetation	Upland Tier IV	10.51	0.10	0.00	0.10	Not Significant
Disturbed/Ruderal Lands	Upland Tier IV	78.16	9.24	0.08	9.32	Not Significant
General Agriculture	Upland Tier IV	22.40	0.54	0.00	0.54	Not Significant
Wetlands						
Disturbed Wetland	Wetland	6.28	0.01	0.04	0.05	Significant
Open Water/Freshwater	Wetland	8.93	0.07	0.00	0.07	Significant
Cismontane Alkali Marsh	Wetland	3.44	0.06	0.00	0.06	Significant
Mule Fat Scrub	Wetland	17.25	0.44	0.00	0.44	Significant
Southern Willow Scrub	Wetland	148.15	0.22	0.04	0.26	Significant
Total^b		481.77	13.01	0.16	13.17	

Note:

a Includes disturbed Diegan coastal sage scrub.

b An additional 2.0 acres of non-impacted urban/developed land, and an additional 14.16 acres of non-impacted wetlands are located within the proposed project area.

Source: Merkel & Associates, *Otay Valley Regional Park Trails Project Biological Impact Analysis*, April 10, 2006, Table 9.

Table 8
Quantitative Summary of Vegetation Community Impacts by City

Vegetation Community	MSCP Habitat Tier	Acres On-site			Acres Impacted		
		San Diego	Chula Vista	Total	San Diego (within MHPA)	Chula Vista (within PMA)	Total**
Diegan Coastal Sage Scrub*	Upland Tier II	144.17	35.55	179.72	1.57 (1.29)	0.13 (0.04)	1.70
Non-Native Grassland	Upland Tier IIIB	3.56	3.37	6.93	0.04 (0.01)	0.59 (0.00)	0.63
Non-native Vegetation	Upland Tier IV	2.85	7.66	10.51	0.05 (0.02)	0.05 (0.04)	0.10
Disturbed/Ruderal Lands	Upland Tier IV	67.67	10.49	78.16	7.55 (5.55)	1.77 (1.25)	9.32
General Agriculture	Upland Tier IV	22.40	0.00	22.40	0.54 (0.38)	0.00 (0.00)	0.54
Subtotal		240.65	57.07	297.72	9.75 (7.25)	2.54 (1.33)	12.29
Disturbed Wetland	Wetland	5.24	1.04	6.28	0.02 (0.02)	0.03 (0.00)	0.05
Open Water/Freshwater	Wetland	8.27	0.66	8.93	0.07 (0.07)	0.00 (0.00)	0.07
Cismontane Alkali Marsh	Wetland	2.59	0.85	3.44	0.05 (0.05)	0.01 (0.01)	0.06
Mule Fat Scrub	Wetland	12.64	4.61	17.25	0.43 (0.38)	0.01 (0.00)	0.44
Southern Willow Scrub	Wetland	111.61	36.54	148.15	0.22 (0.22)	0.04 (0.00)	0.26
Subtotal		140.35	43.70	184.05	0.79 (0.74)	0.09 (0.01)	0.84 (0.68)
TOTAL		381.00	100.77	481.77	10.54 (7.99)	2.63 (1.34)	13.17 (9.33)

Notes:

*includes disturbed Diegan coastal sage scrub

**includes impacts to vegetation for the potential trail connections (off-site impacts in Table

Source: Merkel & Associates, *Otay Valley Regional Park Trails Project Biological Impact Analysis*, April 10, 2006, Table 10.

Table 9
Vegetation Community Impacts and Mitigation Acreages

Vegetation Communities	MSCP Tier Level	San Diego		Chula Vista		Total Impact Acres	Mitigation Acres		
		Impact Acres	Ratio	Impact Acres	Ratio		San Diego	Chula Vista	Total Acres
Phase I segment									
Cismontane Alkali Marsh	Wetland	0.03	2:1	-	2:1*	0.03	0.06	-	0.06
Mule Fat Scrub	Wetland	0.03	2:1	-	2:1*	0.03	0.06	-	0.06
Southern Willow Scrub	Wetland	0.01	2:1	-	2:1*	0.01	0.02	-	0.02
Total		0.07		-		0.07			0.14
Diegan Coastal Sage Scrub *	II	0.44	1:1	-	1.5:1	0.44	0.44	-	0.44
Non-Native Grassland**	IIIB	-	1:1	-	1:1	-	0.00	-	0.00
Non-native Vegetation	IV	-	-	-	-	-	-	-	-
Disturbed/ Ruderal Lands	IV	1.30	-	-	-	1.30	-	-	-
Phase II segment									
Disturbed Wetland	Wetland	0.02	2:1	0.03	2:1*	0.05	0.04	0.06	0.10
Open Water/ Freshwater	Wetland	0.07	2:1	-	2:1*	0.07	0.14	-	0.14
Cismontane Alkali Marsh	Wetland	0.02	2:1	0.01	2:1*	0.03	0.04	0.02	0.06
Mule Fat Scrub***	Wetland	0.15	2:1	0.01	2:1*	0.16	0.26	0.02	0.32
Mule Fat Scrub (in Coastal Overlay Zone)	Wetland	0.25	3:1	-	2:1*	0.25	0.75	-	0.75
Southern Willow Scrub***	Wetland	0.20	2:1	0.05	2:1*	0.25	0.40	0.10	0.50
Total		0.71		0.10		0.81			1.87
Diegan Coastal Sage Scrub *	II	1.13	1:1	0.13	1.5:1	1.26	1.13	0.20	1.33
Non-Native Grassland***	IIIB	0.04	1:1	0.59	1:1	0.63	0.04	0.59	0.63
Non-native Vegetation	IV	0.05	-	0.05	-	0.10	-	-	-
Disturbed/ Ruderal Lands	IV	6.25	-	1.77	-	8.02	-	-	-
General Agriculture	IV	0.54	-	-	-	0.54		-	-

Notes

* Includes disturbed Diegan coastal sage scrub because mitigation is the same

** Non-native grassland impacts are outside of the preserve area in the City of Chula Vista.

*** Maximum ratio of 2:1 within the City of Chula Vista.

Source: Merkel & Associates, *Otay Valley Regional Park Trails Project Conceptual Mitigation Plan*, April 10, 2006, Table 1.

Table 10 Phase 1 Vegetation Community Impacts and Mitigation (City of San Diego)				
Impact	Impact Acreage	Miti- gation Ratio	Required Mitigation	Mitigation Methodology
Coastal Sage Scrub habitat (CSS)	0.44 acres of CSS*	1:1	0.44 acres of CSS	0.44 acres of on-site CSS habitat restoration.
Jurisdictional Wetlands	0.07 acres of wetland impacts including: 0.03 acres CAM 0.03 acres MFS 0.01 acres SWS	2:1	0.14 acres of wetland habitat	<u>CREATION and RESTORATION</u> Excavate and plant 0.14 acres of wetland habitat. This includes: 0.06 acre of CAM 0.06 acre of MFS 0.02 acre of SWS
Source: Merkel & Associates, <i>Otay Valley Regional Park Trails Project Conceptual Mitigation Plan</i> , April 10, 2006, Table 2.				

Table 11
Phase 2 Vegetation Community Impacts and Mitigation
Cities of San Diego (SD) and Chula Vista (CV)

Impact	Impact Acreage	Mitigation Ratio	Required Mitigation	Mitigation Methodology
Coastal Sage Scrub habitat (CSS)	1.26 acres of CSS* (1.13 SD) (0.13 CV)	1:1 (SD) 1.5:1 (CV)	1.33 acres of CSS (1.13 SD) (0.20CV)	Trail closures and reclamation Trail A – 0.02 acre (CV) Trail B – 0.07 acre (SD) Trail C – 0.14 acre (SD) Trail D – 0.01 acre (SD) Total of 0.24 acre of enhancement due to trail closures and reclamation. 1.09 acres of on-site CSS habitat restoration (SD)
Non-native Grassland (NNG)	0.63 acre of NNG (0.04 SD) 0.59 CV)	1:1	0.63 acre of CSS	0.63 acres of on-site CSS habitat restoration (SD).
Jurisdictional Wetlands	<u>TRAILS</u> 0.51 acres (0.41 SD, 0.10 CV) of impacts from trails including: 0.03 acre of Cismontane Alkali Marsh (CAM) 0.05 acre of Disturbed Wetland** 0.11 acre of Mule Fat Scrub (MFS) 0.25 acres of Southern Willow Scrub (SWS) 0.07 acre of Open Water***	2:1	A total of 1.87 acres of wetland mitigation including: 0.06 acre of CAM 1.17 acre of MFS 0.64 acre of SWS of which 0.81 acres must be mitigated as wetland creation.	<u>CREATION</u> Excavate and plant 1.96 acres of wetland habitat in disturbed habitat. This includes: 0.09 acre of CAM 0.93 acre of Mule Fat Scrub 0.92 acre of SWS <u>EXCESS CREATION ****</u> <u>(0.1.13 acres)</u> 0.06 acre of CAM 0.44 acre of MFS 0.60 acre of SWS <u>ENHANCEMENT</u> <i>Trail closures and reclamation</i> Trail A – 0.03 acre of SWS Trail D – 0.01 acre of MFS Trail E – 0.05 acre of MFS Total of 0.09 acre of enhancement due to trail closures <i>Arundo removal area south of Mace Street would be used to enhance 1.24 acres of riparian including:</i> 0.09 acre of CAM 0.64 acre of MFS 0.51 acre of SWS
	<i>plus (in Coastal Overlay Zone):</i> 0.25 acres of impacts on MFS	3:1		
	<u>ACCESS TO WETLAND CREATION SITE:</u> 0.05 acre Mule Fat Scrub (Trail E)	2:1		

Wetland Impacts

Implementation of the proposed project would result in 0.88 acre of wetland habitat impacts. Of these impacts, 0.78 acre would occur in the City of San Diego, and 0.10 acre would occur in the City of Chula Vista (see Table 8). Table 12 identifies wetland impacts occurring within the jurisdiction of the Army Corps of Engineers (ACOE), California Department of Fish and Game (CDFG), and California Coastal Commission within the cities of San Diego and Chula Vista. Listed below are the total impacts by jurisdiction. These totals are the permanent and temporary impacts.

- Impacts occurring within the jurisdiction of the Army Corps of Engineers are: disturbed wetland (0.05-acre), open water (0.07-acre), cismontane alkali marsh (0.05-acre), mule fat scrub (0.07-acre), and southern willow scrub (0.25-acre). The total impact is 0.49-acre.
- Impacts occurring within the jurisdiction of the California Department of Fish & Game are: disturbed wetland (0.05-acre), open water (0.07-acre), cismontane alkali marsh (0.06-acre), mule fat scrub (0.21-acre), and southern willow scrub (0.26-acre). The total impact is 0.65-acre.
- Impacts occurring within the jurisdiction of the California Coastal Commission are: open water (>0.01-acre), mule fat scrub (0.25-acre), southern willow scrub (>0.01-acre). The total impact is 0.25-acre.

The wetland impacts would occur in two phases. Phase 1 includes the construction of a portion of trail segments 1C, 1D, all of segment 5, and staging area 4 (see Figure 2, Attachment B). Phase 2 includes the remaining portions of the proposed project. Table 9 identifies the impacts by phase, jurisdiction, and mitigation requirement.

Impact BR-10. Construction of the Phase 1 trail segments and staging area 4 would impact 0.07-acre of wetlands, including 0.03-acre of cismontane alkali marsh, 0.03-acre of mule fat scrub, and 0.01-acre of southern willow scrub (see Tables 9 and 10). This impact occurs within the City of San Diego.

Impact BR-11. Construction of the Phase 2 trail segments and remaining staging areas would impact 0.81-acre of wetlands, including 0.05-acre of disturbed wetland, 0.07-acre of open water/freshwater, 0.03-acre of cismontane alkali marsh, 0.41-acre of mule fat scrub, and 0.25-acre of southern willow scrub (see Tables 9 and 11). Most of the impact (0.78-acre) occurs in the City of San Diego, and the remaining 0.10-acre occurs in the City of Chula Vista.

Habitat Type	Impact Type	Total Acres by Jurisdiction Habitat Impacts									Total Jurisdictional Impacts Acres On-Site		
		ACOE			CDFG			CCC			City of San Diego	City of Chula Vista	Total
		City of San Diego	City of Chula Vista	Total	City of San Diego	City of Chula Vista	Total	City of San Diego	City of Chula Vista	Total			
Disturbed Wetland	Permanent	0.02	0.03	0.05	0.02	0.03	0.05	-	-	-	0.02	0.03	0.05
	Temporary	-	-	-	-	-	-	-	-	-	-	-	-
Open Water	Permanent	0.05	-	0.05	0.05	-	0.05	-	-	-	0.05	-	0.05
	Temporary	0.02	-	0.02	0.02	-	0.02	>0.01	-	>0.01	0.02	-	0.02
Cismontane Alkali Marsh	Permanent	0.04	-	0.04	0.04	0.01	0.05	-	-	-	0.04	0.01	0.05
	Temporary	0.01	-	0.01	0.01	-	0.01	-	-	-	0.01	-	0.01
Mule Fat Scrub	Permanent	0.05	0.01	0.06	0.18	0.01	0.19	0.23	-	0.23	0.41	0.01	0.42
	Temporary	0.01	-	0.01	0.02	-	0.02	0.02	-	0.02	0.02	-	0.02
Southern Willow Scrub	Permanent	0.17	0.04	0.21	0.17	0.05	0.22	>0.01	-	>0.01	0.17	0.05	0.22
	Temporary	0.03	0.01	0.04	0.03	0.01	0.04	-	-	-	0.03	0.01	0.04
TOTAL	Permanent	0.33	0.08	0.41	0.46	0.10	0.56	0.23	-	0.23	0.69	0.10	0.79
	Temporary	0.07	0.01	0.08	0.08	0.01	0.09	0.02	-	0.02	0.08	0.01	0.09

Notes:
 * Includes off-site impacts (see Table 7.

Source: Merkel & Associates, *Otay Valley Regional Park Trails Project Biological Impact Analysis*, April 10, 2006, Table 12.

Wetland Mitigation

Mitigation of wetland impacts would be accomplished in two phases. Phase 1 includes mitigation for the construction of a portion of trail segments 1C, 1D, all of segment 5, and staging area #4 (see Figure 2, Attachment B). These portions of the proposed project would be funded by the City of San Diego. Phase 2 includes the remaining portions of the proposed project and would be funded by the County of San Diego. Table 13 identifies the mitigation requirements for Phase 1 and Phase 2 (Tables 10 and 11 also provide information about the wetland mitigation requirements).

The wetland mitigation design has 3 components:

- No net loss, achieved by the 1:1 creation of an on-site wetland mitigation area,
- On-site habitat enhancement by closing trails, and
- On-site habitat enhancement by removal of giant reed (*Arundo donax*).

Wetland mitigation would be in-kind with the exception of disturbed wetland, which would be replaced by mule fat scrub, and open water which would be replaced by southern willow scrub. The proposed wetland mitigation measures would result in an excess mitigation acreage that would be reserved for future projects within the OVRP resulting in wetland impacts. The jurisdictional wetland creation and enhancement measures are discussed below and listed in Tables 10, 11, and 13. The locations of the wetland mitigation areas are illustrated in Attachment B, Figure 2.

The Phase 1 wetland impacts will be mitigated at a site just west of the proposed Staging Area #4 (Beyer Boulevard). The Phase 1 wetland creation site currently consists of non-jurisdictional mule fat scrub, which originally consisted of opportunistic broom baccharis (*Baccharis sarothroides*) and mule fat (*Baccharis salicifolia*). Recently, park volunteers have planted a variety of species in this area including toyon (*Heteromeles arbutifolia*), sycamore, mule fat, cottonwood, coast live oak, and blue elderberry (*Sambucus mexicana*). To avoid impacts to these species they would be moved or incorporated into the planting plan.

The Phase 2 wetland impacts will be mitigated at a site within the OVRP south of Rancho Drive. This area is a 1.95-acre ridge located just south of the main channel of the river and is surrounded by southern willow scrub, mule fat scrub, and disturbed Diegan coastal sage scrub (see Figure 2, Attachment B). Elevations within the planting area range from approximately 64 feet MSL for the lower areas within the streambed to 72 feet mean sea level (MSL) for the upper areas. This mitigation site was chosen because of its location and proximity to existing wetlands.

Table 13 Wetland Mitigation by Habitat Type (Phase 1 and Phase 2)							
Impact Mitigation Required			On-Site Mitigation				
San Diego	Chula Vista	Total	Methodology	San Diego	Chula Vista	Total	Total Mitigation
Phase I Mitigation							
Cismontane Alkali Marsh							
0.06			Wetland Creation	0.03		0.03	
			Enhancement	0.03		0.03	0.06
Mule Fat Scrub							
0.06			Wetland Creation	0.03		0.03	
			Enhancement	0.03		0.03	0.06
Southern Willow Scrub							
0.01			Wetland Creation	0.01		0.01	
			Enhancement	0.01		0.01	0.02
Phase II Mitigation							
Disturbed Wetland (mitigated as Mule Fat Scrub)							
0.04	0.06		Wetland Creation	0.10		0.10	
		0.10	Enhancement-(Arundo removal)	0.10		0.10	0.10
Open Water/Freshwater (mitigated as Southern Willow Scrub)							
0.14			Wetland Creation	0.07		0.07	
		0.14	Enhancement-(Arundo removal)	0.07		0.07	0.14
Cismontane Alkali Marsh							
0.04	0.02		Wetland Creation	0.03		0.03	
		0.06	Enhancement-(Arundo removal)	0.02	0.01	0.03	0.06
Mule Fat Scrub (inside and outside Coastal Zone – see Table 7)							
1.05	0.02		Wetland Creation	0.36		0.36	
			Trail Closures; Trail D	0.01		0.01	
		1.07	Enhancement-(Arundo removal)	0.58	0.02	0.60	1.07
Mule Fat Scrub (mitigation for access to wetland mitigation site)							
0.10			Wetland Creation	0.05		0.05	
		0.10	Enhancement (Restoration of Trail E)	0.05		0.05	0.10
Southern Willow Scrub							
0.40	0.10		Wetland Creation	0.25		0.25	
			Trail Closures: Trail A		0.03	0.03	
		0.50	Enhancement-(Arundo removal)	0.10	0.12	0.22	0.50
Source: Merkel & Associates. Otay Valley Regional Park Trails Project Conceptual Mitigation Plan, April 10, 2006, Table 4.							

The Phase 2 wetland creation site consists of disturbed habitat. The main river channel runs to the north of the site and contains high quality southern willow scrub. The wetland creation area is currently classified as disturbed/ruderal lands; it contains some non-native grasses but is primarily a field of short-pod mustard. There is a patch of giant reed on the eastern portion of the site (classified as disturbed wetland) and several non-native trees [Pepper (*Schinus* sp,)] on the western portion of the site. The area south of the wetland creation site is disturbed but contains some Diegan coastal sage scrub species, primarily broom baccharis (*Baccharis sarothroides*). Water also flows south and east of this disturbed coastal sage scrub during the rainy season and supports early successional riparian habitat such as mule fat scrub and a low quality southern willow scrub.

The Phase 2 wetland enhancement area is a 1.22-acre disturbed wetland just south of Mace Street (see Attachment B, Figure 2). This disturbed wetland consists of a monotypic stand of giant reed surrounded by Trail B and Diegan coastal sage scrub to the north and southern willow scrub to the south. The area also contains at least 6 small pockets of giant reed within the southern willow scrub. This enhancement area occurs along a seasonal cobble stream within the river valley and has been used as a trail. This enhancement area was chosen because: (1) it occurs just to the east of an active least Bell's vireo territory and should, therefore, increase habitat quality for this sensitive species, (2) there is one large area that would require active revegetation but also 6 smaller areas that could be allowed to passively revegetate through self-generation, and (3) it would allow for closure of this area as a trail through vegetation placement.

Mitigation Measure BR-10 (Phase 1 Wetland Creation and Enhancement). The Phase 1 wetland impacts will be mitigated by the creation of 0.07-acre of wetlands, and the enhancement of an additional 0.07-acre of wetlands (see Table 13). The west side of an existing 3- to 12-foot wide drainage will be widened and planted with cismontane alkali marsh (0.06-acre), mule fat scrub (0.06-acre), and southern willow scrub (0.02-acre). The wetland creation and enhancement will improve the water quality of existing urban runoff prior to entering the Otay River through prolonged water retention within the created wetland area.

A *Final Wetland Mitigation Plan* will be prepared and approved by the City of San Diego that identifies the (1) financial and implementation responsibilities, (2) site preparation and grading specifications, (3) irrigation requirements, (4) planting specifications, (5) maintenance requirements, (6) monitoring and success assessments, (7) remediation and contingency measures, and (8) requirement for a Final Monitoring and Notice of Completion Report. The *Final Wetland Mitigation Plan* will be based on the *Draft Otay Valley Regional Park Trail Project Conceptual Wetland Mitigation Plan* (March, 2006) that has been prepared in conjunction with the *Otay Valley Regional Park Trails Project Biological Impact Analysis* (April 10, 2006).

Mitigation Measure BR-11a (Phase 2 Wetlands Creation). The Phase 2 wetland impacts will be partially mitigated by the creation of 1.94 acres of wetlands (including 0.09 acres of cismontane alkali marsh, 0.93-acre of mule fat scrub, and 0.92-acre of

southern willow scrub) (see Tables 11 and 13). As shown in Table 11, an excess 1.13 acres of wetland would be created (including 0.06-acre of cismontane alkali marsh, 0.47-acre of mule fat scrub, and 0.60-acre of southern willow scrub) as mitigation for future projects park projects within the OVRP. The proposed wetland creation site is located south of Rancho Drive in the City of San Diego MHPA (see Attachment B, Figure 2).

Mitigation Measure BR-11b (Phase 2 Wetlands Enhancement). The Phase 2 wetland impacts will be partially mitigated by the enhancement of 1.22 acres of disturbed wetland just south of Mace Street. The enhancement site is a 0.98-acre area, plus 6 smaller areas that make up the remainder of the 1.22 acres (see Tables 11 and 13). Most of the enhancement area is located within the City of San Diego, and the remainder of the area is located within the City of Chula Vista. The stand of giant reed, located in the wetland enhancement area shall be removed according to the guidelines identified in Section 5.6 of the *Draft OVRP Habitat Restoration Plan* (February 2006). This plan describes 2 methods for removal that are suitable for this site including: (1) Type I giant reed control for smaller infestation in which no revegetation is planned, and (2) Type II giant reed control for larger infestation requiring subsequent revegetation.

Trails A through E shown on Figure 2 in Attachment B will be closed and planted or allowed to revegetate through natural recruitment. The habitat surrounding these trails consists of ruderal habitat that is compacted from foot traffic and is devoid of vegetation. Trail closures would utilize a variety of revegetation methods depending on the width of the trail and the surrounding vegetation. These methods include: (1) scarifying the soil to a depth of at least 3 inches where the soil has been compacted, (2) allowing the area to self generate, and (3) active revegetation of Trail E. The methods planned for each trail closure are listed in Table 14.

Table 14			
Trail Closures, Enhanced Acreage, Method of Enhancement			
Trail Closure	Habitat Type	Enhancement Acreage	Method of Enhancement
Trail A	Wetland	0.03	Scarify soil if required, and allow vegetation to self generate.
	Upland	0.02	Scarify soil if required, and allow to self generate assisted by coastal sage scrub (CSS) seed mix.
Trail B	Upland	0.07	CSS plantings, enhanced with CSS seed mix.
Trail C	Upland	0.14	CSS plantings, enhanced with CSS seed mix.
Trail D	Wetland	0.01	Scarify soil if required, and allow vegetation to self generate.
	Upland	0.01	Scarify soil if required, and allow vegetation to self generate assisted by CSS seed mix.
Trail E	Wetland	0.05	Riparian plantings, enhanced with riparian seed mix.
Source: Merkel & Associates, <i>Otay Valley Regional Park Trails Project Conceptual Mitigation Plan</i> , April 10, 2006, Table 5.			

A *Final Wetland Mitigation Plan* will be prepared and approved by the County of San Diego that identifies the (1) financial and implementation responsibilities, (2) site preparation and grading specifications, (3) irrigation requirements, (4) planting specifications, (5) maintenance requirements, (6) monitoring and success assessments, (7) remediation and contingency measures, and (8) requirement for a Final Monitoring

and Notice of Completion Report. The *Final Wetland Mitigation Plan* will be based on the *Draft Otay Valley Regional Park Trail Project Conceptual Wetland Mitigation Plan* (April 10, 2006) that has been prepared in conjunction with the *Otay Valley Regional Park Trails Project Biological Impact Analysis* (April 10, 2006).

- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☒ Potentially Significant Unless Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Potentially Significant Unless Mitigation Incorporated: Twelve wetland crossings will be modified, enhanced, or created, including puncheon crossings, culverts, raised trail causeways, and a bridge (see Initial Study project description and Table 3). All crossings, with the exception of the Poggi Creek Bridge (#14) and the raised trail causeway (#6) east of Beyer Boulevard are currently being used as unauthorized crossings without the streambed and stream bank protection the new drainage crossings would provide.

Impact BR-12. Construction of the wetland crossings will result in temporary and permanent direct impacts stream channels, banks, wetland and upland vegetation. The acreage quantification of these impacts is included in the data presented in Table 7 and 8. The mitigation requirements are included in data contained in Tables 10, 11, and 12.

Mitigation Measure BR-12. Mitigation of the wetland impacts resulting from the wetland crossings is included Mitigation Measures BR-10, BR-11a, and BR-11b described above.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

☐ Potentially Significant Impact

☒ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The formalization of the trail system is expected to increase the human usage of the area. However, it is not expected to impact the animals that may use this area as a movement corridor. Most mammalian species present in the Otay River Valley are nocturnal and adapted to urbanization. The valley is currently used by transients that live and move throughout the current trails system, particularly during the night. Increased ranger patrols throughout the OVRP as the proposed project is implemented would decrease unauthorized nighttime use of the trails. Disruption of mammalian activity is likely to decrease as a result of a level of trail usage and ranger patrols. Decreasing nighttime human activity would likely increase the amount of nocturnal mammalian activity. The riparian corridor width will be minimally affected by the development of the trail system as most of the trail widening is located away from the riparian habitat. Substantial riparian and upland cover will persist away from the proposed project allowing mammals to move and “hold-over” in these habitats during the day; therefore, impacts to the wildlife corridor will be less than significant.

- e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

☐ Potentially Significant Impact

☒ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The design of the proposed Otay Valley Regional Park Trails System is consistent with the provisions of the *City of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan* adopted in March 1997, and the *City of Chula Vista MSCP Subarea Plan* adopted in February 2003. The trail system was designed in accord with provisions of *City of San Diego MSCP Subarea Plan* “General Management Directives – Public Access, Trails, and Recreation, and Invasive Exotics Control and Removal” (Section 1.5.2), and “Specific Management Policies and Directives for the Otay River Valley” (Section 1.5.4). The trail system was designed in accord with provisions of *City of Chula Vista MSCP Subarea Plan* “Public Access and Recreation (Section 6.2.1), and “Otay Valley Regional Park Plan Uses” (Section 6.3.4).

V. HISTORIC/CULTURAL (ARCHAEOLOGY) RESOURCES -- Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: A *Cultural Resources Survey for the Otay Valley Regional Park Trails Project West of Interstate 5 to Interstate 805, San Diego, California* (February 2006) was completed by Susan M. Hector, PhD. This study evaluated the significance of the historic and cultural resources based on a review of historical records at the South Coastal Information Center and field survey of the stream and river crossings, staging areas, and a proposed wetland mitigation site related to the construction of trails in Otay Valley Regional Park. The results of two previous studies (*Cultural Resources Existing Conditions Assessment for the Otay Valley Regional Park Trails Project, Interstate 5 to Interstate 805, San Diego, California* and *Cultural Resources Survey of the Proposed Fenton Pond Trail, Otay Valley Regional Park: Supplemental Report*) completed by Susan M. Hector in 2005 were incorporated in the February 2006 study report. Based on an analysis of records and surveys of the proposed project site by Susan M. Hector, PhD on May 16, 2004 and January 29, 2006, no historic resource eligible for the California or National Registers were identified that will be adversely impacted by staging area and trail construction activities.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☒ Potentially Significant Unless Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Potentially Significant Unless Mitigation Incorporated: A report entitled, *Cultural Resources Survey for the Otay Valley Regional Park Trails Project, West of Interstate 5 to Interstate 805, San Diego, California*, prepared by Susan M. Hector, dated February 2006, evaluated the significance of the archaeological resources based on a review of records at the South Coastal Information Center and field surveys. Based on an analysis of records and surveys of the proposed project site by Susan M. Hector, PhD on May 16, 2004 and January 29, 2006, no prehistoric archaeological sites eligible for the California or National Registers were identified that will be adversely impacted by staging area and trail construction activities.

The proposed project involves the construction of trails, stream and river crossings, staging areas, and a wetlands creation site. In some cases, trails follow existing dirt roads or SDG&E access roads. Some trails may require widening, and fill may be placed on trails to make them level. Fences may be built along trails, requiring the excavation of post holes. Crossings will require the construction of culverts and a bridge. Staging areas involve the use of existing level areas, but various other elements may be added, including a ranger station, landscaping, signage, fencing, and other constructed facilities. All of these activities may result in disturbance to the existing ground surface. The known archaeological sites in the project area would not be impacted by the subsequent use of the trails or staging areas because no surface components of the sites exist in the vicinity of the trail segments or related facilities.

No intact archaeological sites were found at any of the trails or trail-related facilities surveyed for the project. No midden deposits were observed. The scattered shell fragments and one flake identified during the field surveys in 2004 and 2006 would not qualify as significant under the California Register or National Register criteria.

Five previously recorded archaeological sites and one pre-1904 railroad spur have been mapped within or near proposed trail segments and related facilities. None of these has been evaluated for significance, and all have the potential for buried deposits. In addition, unknown buried sites could exist throughout the river valley.

Nine sites (SDI-761, SDI-4639, SDI-5513, SDI-7984, SDI-11964, SDI-12024, SDI-13464C, SDI-13719, and P-037-015894) would not be impacted by construction of the trails and related improvements because they are located beyond the limits of trail construction areas. These sites would not be impacted by the subsequent use of the trails because they are sufficiently far from the trails to avoid impacts.

On April 21, 2004, Susan Hector Consulting sent a letter to Mr. Rob Wood of the California Native American Heritage Commission (NAHC) requesting any information concerning traditional cultural sites located in or near the proposed project area. A response received on April 28, 2004, indicates that the NAHC did not have any sacred lands on file in the proposed project area. On May 3, 2004, letters were sent to the following groups requesting additional information:

Viejas Band of Mission Indians
Santa Ysabel Band of Diegueño Indians
Ms. Carmen Lucas

Kumeyaay Cultural Historic Committee
Ewiiapaayp Tribal Office

Sycuan Band of Mission Indians
San Pasqual Band of Mission Indians
Kumeyaay Cultural Repatriation
Committee
Jamul Indian Village
Barona Group of the Capitan Grande
Band of Mission Indians

A letter dated June 10, 2004, was sent from the Sycuan Band of the Kumeyaay Nation to Dr. Hector stating that the band had no direct information regarding Native American impacts from the proposed project. The letter requested that Daniel Foster, of the California Department of Forestry, be contacted for assistance. On June 25, 2004, Dr.

Hector spoke to Mr. Foster, who indicated that he had no information on the cultural resources of the Otay Valley area.

Impact C-1. Subsurface components of five cultural resources sites, and a former railroad line, could be impacted by grading associated with the construction of the trails and staging areas. Sites SDI-4639, SDI-7455/SDI-11963, SDI-11965 and SDI-11966 are located in the City of San Diego. Staging area 7 is located near site SDI-4639, trail segment 1A and staging area 1 are located near site SDI-7455/SDI-11963, trail segment 5 is located near site SDI-11965, and trail segment 1D is located near site SDI-11966. A railroad line is shown on the 1904 USGS map, runs along Boundary Avenue in the City of San Diego. Trail segment 1A appears to follow some portion of the alignment of this railroad spur. Trail segments 6A and 7, and staging area 3 are located near Site SDI-11962, which is within the City of Chula Vista.

Site SDI-4639 was recorded as a scatter of flaked stone tools, and noted as having been destroyed by development near Rios Street. During the 2006 survey, small fragments of shell were found mixed with the sediments and fill soils in the staging area. These may be dredged fill, or may represent the highly disturbed remnants of SDI-4639.

Site SDI-7455/SDI-11963 was recorded east and west of Interstate 5 south of Louret Avenue. No trace of the site east of Interstate 5 was observed during the May 16, 2004 or 2006 field inspections. A dense scatter of shell was noted at Staging Area 1 and trail segment 1A. The shell was in a sandy matrix, and no midden was noted. No lithic artifacts were observed. In addition, non-cultural gastropod species were mixed with the sandy soil, indicating the possible presence of dredged marine material.

Site SDI-7455 has never been evaluated for significance under the California Register or National Register criteria. The most extensive investigation of SDI-7455 was undertaken by ASM as part of an investigation for the Otay River Pump Station. Archaeological materials were identified during monitoring for installation of the sewer facility. To delineate the culturally sensitive area, a series of cores were mechanically excavated. Three distinct subsurface deposits were found: two dated to the Late Prehistoric period, and one dated to the Archaic period. The most recent Late Prehistoric component was dated to post-1679. This component may represent the village of Chiayp. The earlier Late Prehistoric deposit was dated to between AD 1337 and 1512. The Archaic component was dated to between 3515 and 3075 BC. The deposits were buried between 2 to 5 meters below the surface. This significant discovery indicates that buried, intact archaeological deposits are present in Otay Valley, and could be adversely impacted by grading associated with the proposed project.

The location of Staging Area 1 and the trail east into Otay Valley is outside the area where buried deposits were found by ASM; corings near Staging Area 1 did not contain any cultural materials. The presence of sandy soils and marine gastropods suggest that much of the shell found in the project area may be from dredging activities rather than from the archaeological site. In addition, the area of Staging Area 1 was, until recently, covered by structures and is highly disturbed. However, the entire trail project area in

the vicinity of SDI-7455 was not tested during the ASM investigations. It is possible that an intact, buried deposit exists.

Site SDI-11962 is currently in a fill pad area, and grading on the pad has been as recent as 2004. During the 2004 survey, a large pile of dirt from the pad was observed. The site was recorded as a light scatter of flakes. One flake and two shell fragments were observed during the May 16, 2004, field inspection. Given the severe disturbance at the site area, it is unlikely that the site still exists. However, if any part of the site exists subsurface, this site could be impacted by construction of the trails.

SDI-11965 is located at the edge of an existing pond. This area is an artificial dike, and no trace of the site was seen during the May 16, 2004, field inspection. The entire Fenton Pond trail segment was surveyed in 2005. However, if any part of the site exists subsurface, this site could be impacted by construction of the trails.

SDI-11966 is on the south side of Otay River in a disturbed area. Based on the field inspection of May 16, 2004, the site is located at least twenty meters south of the existing dirt road. However, a subsurface component of the site could be present near the proposed trail. This site could be impacted by construction of the trails.

Railroad Spur A railroad line is shown on the 1904 USGS map, running along Boundary Avenue. Trail segment 1A appears to follow some portion of the alignment of this railroad spur. No evidence of the railroad was identified during the field survey. If any features or remains of the railroad spur are present, they could be impacted by trail maintenance activities.

Mitigation Measure C-1. The following archeological resource mitigation measure shall be included as a condition of project approval.

Prior to Preconstruction (Precon) Meeting

1. Land Development Review (LDR) Plan Check
 - a. Prior to the first Precon Meeting, the Environmental Review manager (ERM) of LDR shall verify that the requirements for Archaeological Monitoring and Native American monitoring, if applicable, have been noted on the appropriate construction documents.
2. Letters of Qualification have been submitted to the Assistant Deputy Director (ADD)
 - a. Prior to the first Precon Meeting, the applicant shall provide a letter of verification to the ERM of LDR stating that a qualified Archaeologist, as defined in the City of San Diego Historical Resources Guidelines (HRG) has been retained to implement the monitoring program. If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
3. Second Letter Containing Names of Monitors has been sent to Mitigation Monitoring Coordination (MMC)
 - a. At least thirty days prior to the Precon Meeting a second letter shall be submitted to MMC which shall include the name of the Principal Investigator (PI) and the names of all persons involved in the Archaeological Monitoring of the project.

- b. MMC will provide Plan Check with a copy of both the first and second letter.
- 4. Records Search Prior to Precon Meeting
 - a. At least thirty days prior to the Precon Meeting the qualified Archaeologist shall verify that a records search has been completed and updated as necessary and be prepared to introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. Verification includes, but is not limited to a copy of a confirmation letter from South Coast Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.

Precon Meeting

- 1. Monitor Shall Attend Precon Meetings
 - a. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the Archaeologist, Construction Manager and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
 - b. If the Monitor is not to attend the Precon Meeting, the RE or BI, if appropriate will schedule a focused Precon Meeting for MMC, Environmental Analysis Section (EAS) staff as appropriate, Monitors, Construction Manager and appropriate Contractor's representatives to meet and review the job on-site prior to the start of any work that requires monitoring.
- 2. Units of Measure and Cost of Curation for Capital Improvement Project (CIP) or Other Public Projects
 - a. Units of measure and cost of curation will be discussed and resolved at the Precon meeting prior to start of any work that requires monitoring.
- 3. Identify Areas to be Monitored
 - a. At the Precon Meeting, the Archaeologist shall submit to MMC a copy of the site/grading plan (reduced to 11x17) that identifies areas to be monitored as well as areas that may require delineation of grading limits.
- 4. When Monitoring Will Occur
 - a. Prior to the start of work, the Archaeologist shall also submit a construction schedule to MMC through the RE or BI, as appropriate, indicating when and where monitoring is to begin and shall notify MMC of the start date for monitoring.

During Construction

- 1. Monitor Shall be Present During Grading/Excavation
 - a. The qualified Archaeologist shall be present full-time during grading/ excavation of native soils and shall document activity via the Consultant Site Visit Record. This record shall be sent to the RE or BI, as appropriate, each month. The RE, or BI, as appropriate, will forward copies to MMC.
- 2. Monitoring of Trenches Will Include Mainline, Laterals, and all Appurtenances
 - a. Monitoring of trenches is required for the mainline, laterals, services and all other appurtenances that impact native soils one foot deeper than existing as detailed

on the plans or in the contract documents identified by drawing number or plan file number. *It is the Construction Manager's responsibility to keep the monitors up-to-date with current plans.*

3. Discoveries

a. Discovery Process

(1) In the event of a discovery, and when requested by the Archaeologist, or the PI if the Monitor is not qualified as a PI, the RE or BI, as appropriate, shall be contacted and shall divert, direct or temporarily halt ground disturbing activities in the area of discovery to allow for preliminary evaluation of potentially significant archaeological resources. The PI shall also immediately notify MMC of such findings at the time of discovery. MMC will coordinate with appropriate LDR staff.

b. Determination of Significance

(1) The significance of the discovered resources shall be determined by the PI in consultation with the LDR and the Native American Community, if applicable. LDR must concur with the evaluation before grading activities will be allowed to resume. For significant archaeological resources, a Research Design and Data Recovery Program shall be prepared, approved by DSD and carried out to mitigate impacts before ground disturbing activities in the area of discovery will be allowed to resume.

4. Human Remains

If human remains are discovered, work shall halt in that area and the following procedures set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

a. Notification

(1) Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS).

(2) The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

b. Isolate discovery site

(1) Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.

(2) The Medical Examiner, in consultation with the PI, shall determine the need for a field examination to determine the provenience.

(3) If a field examination is not warranted, the Medical Examiner shall determine with input from the PI, if the remains are or are most likely to be of Native American origin.

c. If Human Remains are determined to be Native American

(1) The Medical Examiner shall notify the Native American Heritage Commission (NAHC).

(2) The NAHC will contact the PI within 24 or sooner, after Medical Examiner has completed coordination

- (3) NAHC will identify the person or persons determined to be the Most Likely Descendent (MLD) and provide information.
- (4) The PI will coordinate with MLD for additional consultation.
- (5) Disposition of Native American Human Remains will be determined between MLD and the PI, if:
 - (a) The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 24 hours after being notified by the Commission; OR,
 - (b) The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94(k) by the NAHC fails to provide measures acceptable to the landowner.
- d. If Human Remains are **NOT** Native American
 - (1) The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
 - (2) The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).
 - (3) If the remains are of historic origin, they shall be appropriately removed and conveyed to the Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant department and/or Real Estate Assets Department (READ) and the Museum of Man.
- 5. Night Work
 - a. If night work is included in the contract
 - (1) When night work is included in the contract package, the extent and timing shall be presented and discussed at the Precon meeting.
 - (2) The following procedures shall be followed.
 - (a) No Discoveries

In the event that nothing was found during night work, the PI will record the information on the Site Visit Record Form.
 - (b) Minor Discoveries

All Minor Discoveries will be processed and documented using the existing procedures under During Construction; 3.c., for Small Historic Discoveries, with the exception in During Construction; 3.c.(1)(a), that the PI will contact MMC by 9 A.M. the following morning.
 - (c) Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures under During Construction; 3.a. & b, will be followed, with the exception that in During Construction; 3.a., the PI will contact MMC by 8 A.M. the following morning to report and discuss the findings.
 - b. If night work becomes necessary during the course of construction
 - (1) The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
 - (2) The RE, or BI, as appropriate, shall notify MMC immediately.
 - c. All other procedures described above shall apply, as appropriate.
- 6. Notification of Completion

- a. The Archaeologist shall notify MMC and there or the BI, as appropriate, in writing at the end date of monitoring.

Post Construction

1. Handling and Curation of Artifacts and Letter of Acceptance
 - a. The Archaeologist shall be responsible for ensuring that all cultural remains collected are cleaned, catalogued, and permanently curated with an appropriate institution; that a letter of acceptance from the curation institution has been submitted to MMC; that all artifacts area analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
 - b. Curation of artifacts associated with the survey, testing and/or data recovery for this project shall be completed in consultation with LDR and the Native American representative, as applicable.
 2. Final Results reports (Monitoring and Research Design and Data Recovery Program)
 - a. Within three months following the completion of monitoring two copies of the Final Results Report (even if negative) and/or evaluation report, if applicable, which describes the results, analysis, and conclusions of the Archaeological Monitoring Program (with appropriate graphics) shall be submitted to MMC for approval by the ERM of LDR.
 - b. For significant archaeological resources encountered during monitoring, the Research Design and Data Recovery Program shall be included as part of the Final Results Report.
 - c. MMC shall notify the RE or BI, as appropriate, of receipt of the Final Results Report.
 3. Recording Sites with State of California Department of Park and Recreation
 - a. The Archaeologist shall be responsible for recording (on the appropriate State of California Department of park and Recreation forms - DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal information Center with the Final Results Report.
- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

☐ Potentially Significant Impact

☒ Less than Significant Impact

☐ Potentially Significant Unless
Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Potentially Significant Unless Mitigation Incorporated:

Potential impacts would be less than significant because grading and/or excavation would not occur at depths greater than 10 feet below the existing ground level.

d) Disturb any human remains, including those interred outside of formal cemeteries?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: Based on an analysis of records and surveys of the project site by Susan M. Hector, PhD on May 16, 2004 and January 29, 2006, it has been determined that the proposed project will not disturb any human remains because the proposed project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. The results of the analysis of records and surveys is documented in a report entitled, *Cultural Resources Survey for the Otay Valley Regional Park Trails Project, West of Interstate 5 to Interstate 805, San Diego, California*, prepared by Susan M. Hector, dated February 2006.

VI. GEOLOGY AND SOILS -- Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: The proposed project is not located in a fault rupture hazard zone identified by the *Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, and Fault-Rupture Hazards Zones in California*. Therefore, there will be no impact from the exposure of people or structures to adverse effects from a known hazard zone as a result of this proposed project.

- ii. Strong seismic ground shaking?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: The *Uniform Building Code (UBC)* and the *California Building Code (CBC)* classifies all San Diego County with the highest seismic zone criteria, Zone 4. However, the proposed project is not located within 5 kilometers of the centerline of a known active-fault zone as defined within the *Uniform Building Code's Maps of Known Active Fault Near-Source Zones in California*. The Rose Canyon Fault is located approximately 13.7 kilometers northwest of the proposed project site. In addition, the proposed project will have to conform to the *Seismic Requirements -- Chapter 16 Section 162- Earthquake Design* as outlined within the *California Building Code*. Section 162 requires a soils compaction report (contained within the Geology Report) with proposed foundation recommendations for the retaining wall to be approved by a City of San Diego and City of Chula Vista Structural Engineer before the issuance of a building or grading permit. Therefore, there will be no impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking as a result of this proposed project.

- iii. Seismic-related ground failure, including liquefaction?

- | | |
|---------------------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: There is a potential for liquefaction at the proposed Poggi Creek bridge site, in the City of San Diego, due to the relatively shallow groundwater table and loose nature of some of the alluvial soils underlying the bridge site. The bridge is proposed as a 13-wide single-span steel truss bridge supported on a shallow foundation (i.e., generally less than 3 feet deep). Alternatively, a pile foundation may be used which would be founded approximately 10 feet below the anticipated channel scour depth. The bridge would be located less than 5 feet above the channel bottom.

While liquefaction and seismically induced settlement were not quantitatively evaluated with respect to the proposed bridge over Poggi Creek, catastrophic structural failure is unlikely due to the nature of the prefabricated bridge structure, slow movements of the bridge structure during liquefaction, and relatively small amount of potential vertical movement. If the bridge were to settle due to liquefaction of the underlying soils, the anticipated vertical movement of the superstructure would be less than $2\pm$ feet. Based on the type of structure and intended use, the potential for liquefaction would have a less than significant impact on the bridge.

iv. Landslides?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The site is located within a marginally susceptible zone as identified in the *Department of Mining and Geology Landslide Hazards in the Southern Part of the San Diego Metropolitan Area, San Diego County, California, Plate 33G (Imperial Beach Quad) Open File Report 95-03*. Based on a review of the geologic data and reports the consulting geologist, Paul Theriault (Ninyo & Moore) concluded that proposed project would not be impacted by landsliding.

b) Result in substantial soil erosion or the loss of topsoil?

☐ Potentially Significant Impact

☒ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: According to the *Soil Survey for the San Diego Area*, the soils on-site are identified as Olivenhain, Reiff, Riverwash, Terrace escarpments, Tujunga, and Visalia soil associations that have a soil erodibility rating of “moderate” and “severe” as indicated by the *Soil Survey for the San Diego Area*, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. However, the proposed project will not result in substantial soil erosion or the loss of topsoil for the following reasons:

1. The majority of the proposed trails will be located on existing informal trails and utility easement roads. Very little grading will be required for these trails. The length of the 3 new trails segments is approximately 3,500 feet, and the placement of these segments will not alter existing drainage patterns; or any significant drainage features. The only segment located on steep slopes is the 850±-foot long and 4-foot wide Finney School trail (segment 11).
2. The construction contractor will prepare a Storm Water Pollution Prevention Program (SWPPP). The SWPPP will include the following Best Management Practices (BMPs) to ensure sediment does not erode from the proposed project site.
3. The project involves grading and will be required to comply with the:
 - a. City of San Diego Municipal Code, Chapter 14, Article 2, Division 1 (Grading Regulations) Division 2 (Drainage Regulations), Division 3 (§ 142.0340, Retaining Walls in All Zones), Article 2, Division 4 (Landscape Regulations), and Article 3 Division 1 (Environmentally Sensitive Lands Regulations).
 - b. City of Chula Vista Municipal Code Title 14, Chapter 14.20 Storm Water Management and Discharge Control, and Chapter 15, Building and Construction, Chapter 15.04 Excavation, Grading, and Fills.

Compliance with these regulations minimizes the potential for water and wind erosion. Based on the factors listed above, it has been found that the proposed project will not result in substantial soil erosion or the loss of topsoil on a project level.

In addition, the proposed project will not contribute to a cumulatively considerable impact because all the of past, present and future projects included on the list of projects that involve grading or land disturbance are required to follow the requirements of the City of San Diego Municipal Code, Chapter 14, Article 2, Division 1 (Grading Regulations) Division 2 (Drainage Regulations), Division 3 (§ 142.0340, Retaining Walls in All Zones), Article 2, Division 4 (Landscape Regulations), and Article 3, Division 1 (Environmentally Sensitive Lands Regulations), and City of Chula Vista Municipal Code Title 14, Chapter 14.20, Storm Water Management and Discharge Control, and Chapter 15, Building and Construction, Chapter 15.04, Excavation, Grading, and Fills. Refer to

XVII. Mandatory Findings of Significance for a comprehensive list of the projects considered.

- c) Will the project produce unstable geological conditions that will result in adverse impacts resulting from landslides, lateral spreading, subsidence, liquefaction or collapse?

- | | |
|---------------------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: As discussed in Section VI. a) iii above, there is a potential for subsidence and liquefaction at the proposed Poggi Creek bridge site. However, the potential for subsidence and liquefaction would have a less than significant impact on the bridge as previously discussed. As discussed in Section VI. a) iv above, there would be no impact associated with landslides.

- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

- | | |
|---------------------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: A portion of the trails (segment 1B) would be located on expansive soils with a severe expansive rating in the *Soil Survey for the San Diego Area*, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. Portions of trail segments 1D, 1E, and 10 would be located on expansive soils with a moderate expansive rating. However the proposed project does not propose to construct structures that would be affected by expansive soils. Therefore, these soils will not create substantial risks to life or property. A Geotechnical Report has not been completed for the proposed project.

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is the construction of a hiking, biking, and equestrian trails system, including staging areas and drainage crossing. The proposed project does not propose any septic tanks or alternative wastewater disposal systems since no wastewater will be generated.

VII. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes?

- | | |
|----------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporation | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project will not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of hazardous substances, nor are hazardous substances proposed or currently in use in the immediate vicinity of the trail system.

- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project will not contain, handle, or store any potential sources of chemicals or compounds that would present a significant risk of accidental explosion or release of hazardous substances.

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Although the proposed project is located within one-quarter mile of existing schools (Montgomery High School and Finney Elementary School), the proposed project does not propose the handling, storage, or transport of hazardous materials. Therefore, the proposed project will not have any effect on an existing or proposed school.

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

- | | |
|---------------------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project will not create a significant hazard to the public or the environment because the construction and use of the trails system will not install or utilize any hazardous materials. A computerized, environmental information database search was performed by Ninyo & Moore using Track Info Services, LLC (TRACK Info) on April 29, 2005 to determine if there are any known hazardous sites identified as having experienced significant unauthorized releases of hazardous substances or other events with potentially adverse environmental effects within one-quarter mile (0.25-mile) of the OVRP site. The TRACK Info search included federal, state, and local databases.

Based on the findings of the database search, it is Ninyo & Moore's opinion that there is a low likelihood that the facilities appearing in the environmental database report have negatively impacted the environmental integrity of the OVRP site. Three underground storage tanks (USTs) on the UST/AST list are reported to be located on Hollister Street within the boundaries of the OVRP. These sites are California Commercial Asphalt (387 Hollister St.), Hanson Aggregates (389 Hollister St.), and Fun Farm, Inc. (408 Hollister St.). However, construction of the trails system would not require the removal of the tanks or grading activities in the vicinity of the USTs.

The former Shinohara I landfill site is located south of Auto Park Drive between I-805 and Brandywine Avenue, approximately ½ mile northeast of the OVRP trails system. The former Shinohara II landfill site is located south of the Otay River east of I-805, approximately 1/3 mile east of the OVRP trails system. Most of the Shinohara I site has been clean-closed by excavating and removing the burn ash from the area. A 30-foot to 40-foot deposit of burn ash may remain at the Shinohara II site. Based on the distance of these sites from the proposed project, there is a low likelihood that these facilities would significantly impact the OVRP trails area.

The trails system proposed project will not create a significant hazard to the public or the environment because it will not introduce hazardous materials into the OVRP, nor will it expose trail users to hazardous materials located in the OVRP or surrounding area.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is not located within a Comprehensive Land Use Plan (CLUP) for airports, or within two miles of a public airport. Also, the proposed project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the proposed project will not constitute a safety hazard for people residing or working in the proposed project area.

- f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is not within one mile of a private airstrip. As a result, the proposed project will not constitute a safety hazard for people residing or working in the proposed project area.

- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

- | | |
|---------------------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

The following sections summarize the proposed project's consistency with applicable emergency response plans or emergency evacuation plans.

i. OPERATIONAL AREA EMERGENCY PLAN:

No Impact: The *Operational Area Emergency Plan* is a framework document that provides direction to local jurisdictions to develop specific operational area of San Diego County. It provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The proposed project will not interfere with this plan because it will not prohibit subsequent plans from being established.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

No Impact: The *San Diego County Nuclear Power Station Emergency Response Plan* will not be affected by the proposed project due to its location in the OVRP which is outside emergency planning zone which has a 10-mile radius.

iii. OIL SPILL CONTINGENCY ELEMENT

No Impact: The *Oil Spill Contingency Element* will not be interfered with because the proposed project does involve activities that would interfere with implementation of Oil Spill Contingency Element.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

No Impact: The *Emergency Water Contingencies Annex and Energy Shortage Response Plan* will not be interfered with because the proposed project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

v. DAM EVACUATION PLAN

Less Than Significant Impact: The OVRP is located in the inundation area of the Lower Otay Dam. Failure of the dam would result in the flooding of the Otay Valley from the Reservoir to San Diego Bay. The inundation area extends westerly from the dam along Otay Valley Road and Main Street to the Bay. The OVRP trails system will not interfere with the *Dam Evacuation Plan* because the proposed project does not include a hospital, school, skilled nursing facility, retirement home, mental health care facility, care facility with patients that have disabilities, adult and childcare facility, jails/detention facilities, stadium, arena, amphitheater, or similar use that may limit the ability of the County Office of Emergency Services to implement a dam evacuation plan.

- h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is completely surrounded by urbanized areas, and/or irrigated lands and there are no adjacent wildland areas.

- i) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

- | | |
|---------------------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project involves the construction and use of equestrian trails and animal waste will likely be present along the trail system which would attract flies. Animal waste would be dispersed through the OVRP area and not concentrated in any specific location. Animal waste will be routinely removed as part of the OVRP maintenance program.

The proposed project will not involve or support uses that allow water to stand for a period of 72 hours (3 days) or more (e.g. artificial lakes, agricultural irrigation ponds).

VIII. HYDROLOGY AND WATER QUALITY -- Would the project:

a) Violate any waste discharge requirements?

☐ Potentially Significant Impact☐ Less than Significant Impact☐ Potentially Significant Unless
Mitigation Incorporated☒ No Impact

Discussion/Explanation:

No Impact: The proposed project does not propose waste discharges that require waste discharge requirement permits or NPDES permits from the San Diego Regional Water Quality Control Board (SDRWQCB). In addition, the proposed project does not propose any known sources of polluted runoff or land use activities that would require special site design considerations, source control Best Management Practices (BMPs) or treatment control BMPs, under the San Diego Municipal Storm Water Permit (SDRWQCB Order No. 2001-01).

b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?

☐ Potentially Significant Impact☒ Less than Significant Impact☐ Potentially Significant Unless
Mitigation Incorporated☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The proposed project lies in the Otay Valley hydrologic area, within the Otay hydrologic unit. According to the Clean Water Act Section 303(d) list, July 2003, although portions of the Pacific Ocean at Coronado are impaired for coliform bacteria, no portion of the Otay River, which is tributary to the Pacific Ocean, is impaired. Constituents of concern in the Otay watershed include coliform bacteria, trace metals and other toxic constituents. The Stormwater Prevention Pollution Plan (SWPPP) prepared for the proposed project by the construction contractor will implement site design measures, source control, and/or treatment control BMPs to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable (see following Section VIII.e for additional information). BMPs are required during construction activities which would include, but is not limited to, features such as storm drain inlet protection, stabilized construction entrance/exit areas, and silt fencing. Specifications for stabilized construction entrance/exit areas would be provided to minimize transport of sediment off-site. Silt fences and fiber rolls would be specified to minimize surface transport of sediments. The implementation of BMPs as stated in the contract documents in accordance with the City of San Diego Stormwater Regulations would reduce water quality impacts to a less than significant level.

Animal waste along the trail system would contribute coliform bacteria to the Otay River watershed; however, the amount of coliform bacteria would be negligible because animal waste will be routinely removed as part of the OVRP maintenance program. The proposed project does not propose any other known sources of pollutants, or land use activities that might contribute these pollutants.

- c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: The proposed project does not propose any known sources of polluted runoff. In addition the proposed project does not propose new storm water drainage facilities except for low flow culverts, nor does the proposed project propose to alter the existing drainage features of the Otay River Valley.

- d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: The proposed project will not use groundwater for any purpose, including irrigation, domestic or commercial demands. In addition, the proposed project does not involve operations that would interfere substantially with groundwater recharge including, but not limited to the following: the proposed project does not involve regional diversion of water to another groundwater basin; or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g. ¼ mile). Therefore, no impact to groundwater resources is anticipated.

- e) Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

- | | |
|---------------------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project proposes to develop staging areas and a formal hiking, biking, and equestrian trail system in the OVRP. The Storm Water Prevention Pollution Plan (SWPPP) prepared for the proposed project will implement site design measures, source control, and/or treatment control BMPs to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable. BMPs are required during construction activities which would include (but is not limited to) features such as storm drain inlet protection, stabilized construction entrance/exit areas, and silt fencing. Specifications for stabilized construction entrance/exit areas would be provided to minimize transport of sediment off-site. Silt fences and fiber rolls would be specified to minimize surface transport of sediments. The implementation of BMPs as stated in the contract documents in accordance with the City of San Diego Stormwater Regulations would reduce water quality impacts to a less than significant level. These measures will control erosion and sedimentation, and satisfy waste discharge requirements as required by the *Land-Use Planning for New Development and Redevelopment Component of the San Diego Municipal Permit* (SDRWQCB Order No. 2001-01), as implemented by the *San Diego County Jurisdictional Urban Runoff Management Program* (JURMP) and *Standard Urban Storm Water Mitigation Plan* (SUSMP). The SWPPP will specify and describe the implementation process of all BMPs related to equipment operation, materials management, and erosion and sedimentation prevention in on-site and downstream drainage swales. The City of San Diego and City of Chula Vista will ensure that the SWPPP is implemented. Due to these factors, it has been found that the proposed project will not result in significantly increased erosion or sedimentation potential and will not alter any drainage patterns of the site or area on- or off-site. In addition, because erosion and sedimentation will be controlled within the boundaries of the proposed project, the proposed project will not contribute to a cumulatively considerable impact. For further information on soil erosion refer to VI., Geology and Soils, Question b.

The drainage improvements required at Staging Area #4 (Beyer Boulevard) would not result in a substantial change to the existing drainage pattern of the site, the Otay River, or associated stream courses because the improvements would be limited to:

- Widening a 300-foot long section of the channel to accommodate existing flows that now sheet-flow across the site.
- Cleaning debris and silt out of the existing storm drain so as to return it to its design capacity.

- Relocating the existing brow ditch so that it discharges into the channel rather than onto the site where it contributes to the existing sheet-flow condition.
- f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
- | | |
|---------------------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project will not significantly alter established drainage patterns or significantly increase the amount of runoff for the following reasons:

- Drainage will be conveyed to either natural drainage channels or approved drainage facilities.
- The proposed project will not increase water surface elevation in the Otay River or its tributaries.
- The proposed project will not increase surface runoff exiting the proposed project site equal to or greater than one cubic foot/second.

Therefore, the proposed project will not substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Moreover, the proposed project will not contribute to a cumulatively considerable alteration or a drainage pattern or increase in the rate or amount of runoff, because the proposed project will substantially increase water surface elevation or runoff exiting the site, as detailed above.

Improvements to Staging Area #4 would increase the impervious surface by approximately 2,000 sq.ft. (0.05-acre). The rate or amount of surface runoff resulting from the impervious area would be negligible because it is less than 1% of the 7.9-acre site.

g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: The storm water drainage systems proposed by the proposed project are limited to box and low-flow culverts crossings of the Otay River and tributary streams. At Staging Area #4 the existing drainage channel would be widened, the brow ditch relocated to discharge into the channel, and debris and silt removed from the existing storm drain. The runoff from the trails and staging areas would not exceed the capacity of the existing storm drain system because impervious surfaces are limited to the access driveways at the staging areas and the 2 buildings at Staging Area #4.

h) Provide substantial additional sources of polluted runoff?

☐ Potentially Significant Impact

☒ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Less than Significant Impact: Equestrian use of the trails east of Beyer Way could result in pathogens and increased nutrients that cause algal blooms in riparian areas. However, this would be a less than significant impact because the trails will be surfaced with native soil, decomposed granite, or crushed rock which will allow for absorption of toxins from horse urine and manure from equestrian use of the trails.

Parking at each staging area is limited to 10 cars each, except at Staging Area #4 which would provide 12 spaces. The surface of the parking areas will be decomposed granite which will allow for absorption of water, fuel, and oils. The staging areas shall be surrounded by a planted area that is hydroseeded with a native grass mix that will absorb runoff similar to a grass-lined swale.

Trails will be monitored for erosion and runoff problem areas and corrective actions would be taken, including the use of stone or wood cross-joints or edge planting of native grasses, to prevent erosion. Trail maintenance will be managed by the City of San Diego on an ongoing basis. In addition, the proposed project does not propose new storm water drainage facilities except low-flow culverts.

- i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Otay River is mapped on a Federal Emergency Management Administration (FEMA) floodplain map, and City of San Diego and City of Chula Vista Floodplain Maps. However, the proposed project is not proposing to place structures with a potential for human occupation within these areas and will not place access roads or other improvements which will limit access during flood events or affect downstream properties.

- j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project site is located within a 100-year flood hazard area. However, the proposed project is not proposing to place structures, access roads or other improvements which will impede or redirect flood flows in these areas.

- k) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

- | | |
|---------------------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant: The proposed project lies within the mapped Lower Otay Lake dam inundation area as identified on an inundation map prepared by the County of San Diego Office of Emergency Services. However, the proposed project will not expose people or structures to a significant risk of loss injury, or death because the OVRP trails system does not include a hospital, school, skilled nursing facility, retirement home, mental health care facility, care facility with patients that have disabilities, adult and childcare facility, jails/detention facilities, stadium, arena, amphitheater, or similar use

that may limit the ability of the County Office of Emergency Services to implement a dam evacuation plan.

The proposed project lies within a special flood hazard area as identified on the *Flood Insurance Rate Map (FIRM)*, and City of San Diego and City of Chula Vista Flood Plain Maps. However, the proposed project does not include structures with a potential for human occupation within these areas and will not place access roads or other improvements which will limit access during flood events or affect downstream properties.

l) Inundation by seiche, tsunami, or mudflow?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless
Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

i. SEICHE

No Impact: The proposed project site is not located along the shoreline of a lake or reservoir; therefore, could not be inundated by a seiche.

ii. TSUNAMI

No Impact: The proposed project site is located more than a mile from the coast of the Pacific Ocean; therefore, in the event of a tsunami, the OVRP would not be inundated.

iii. MUDFLOW

No Impact: The site is located within a marginally susceptible zone as identified in the *Department of Mining and Geology Landslide Hazards in the Southern Part of the San Diego Metropolitan Area, San Diego County, California, Plate 33G (Imperial Beach Quad) Open File Report 95-03*. Based on a review of the geologic data and reports the consulting geologist, Paul Theriault (Ninyo & Moore) concluded that proposed trails proposed project would not be impacted by landsliding.

IX. LAND USE AND PLANNING -- Would the project:

a) Physically divide an established community?

☐ Potentially Significant Impact☐ Less than Significant Impact☐ Potentially Significant Unless
Mitigation Incorporated☒ No Impact

Discussion/Explanation:

No Impact: The proposed project does not propose new infrastructure such as major roadways, water supply systems, or utilities to the area. Therefore, the proposed project will not significantly disrupt or divide the established community.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

☐ Potentially Significant Impact☐ Less than Significant Impact☐ Potentially Significant Unless
Mitigation Incorporated☒ No Impact

Discussion/Explanation:

No Impact: The proposed project site is included in the *Otay Valley Regional Park Concept Plan* which proposes to provide a mix of active and passive recreation activities in the Otay River Valley while protecting environmentally sensitive areas, cultural and scenic resources, and encourages compatible agricultural uses in the park. The *Otay Valley Regional Park Concept Plan* was adopted by the City of San Diego Council on April 17, 2001, the City of Chula Vista on May 15, 2001, and the County of San Diego on May 23, 2001.

The proposed project site is included in the *City of San Diego MSCP Subarea Plan*, and development of the proposed project is consistent with the *Subarea Plan*. Section 1.4.1 of the *City of San Diego MSCP Subarea Plan* identifies passive recreation uses as conditionally compatible uses within the Multiple Habitat Planning Area (MHPA). The proposed OVRP trails system is compatible with general management directives that apply to "Public Access, Trails, and Recreation" contained in Section 1.5.2 of the *Subarea Plan*. These directives address signage, trail location and width, paving, maintenance, litter/trash removal, and invasive exotics control and removal. The proposed project is also compatible with the "Specific Management Policies and Directives for the Otay River Valley" contained in Section 1.5.4.

The proposed project is a permitted use within the underlying zone within the City of San Diego (Municipal Code Tables 131-02B and 131-03B, and Section 143.0130). The

proposed project site is designated as Open Space & Special Study Area by the *City of San Diego Otay Mesa-Nestor Community*.

The proposed project site is designated as Open Space by the *City of Chula Vista General Plan*. This plan designation provides for the development of a trail system in the OVRP. The proposed project site is also included the *City of Chula Vista MSCP Subarea Plan* (Section 6.3.3.1 and Table 6-1). Development of the proposed project is consistent with the Facilities Siting Criteria listed in Section 6.3.3.4 of the *Subarea Plan*. Section 6.2 of the *City of Chula Vista MSCP Subarea Plan* identifies limited public access and passive recreation as permitted uses within the Preserve area, and land uses identified in the *OVRP Concept Plan* are compatible with the *MSCP Subarea Plan* if developed consistent with the Otay Valley Regional Park Plan Uses (Section 6.3.4). Access points, new trails and facilities, and control of public access are required to be consistent with the *City of Chula Vista Planning Component Framework Management Plan* and future area-specific management directives. The Managing Entity is authorized to close selected areas of the Preserve Management Area (PMA) to public use, temporarily or permanently, if public access results in, or is expected to result in, significant negative impacts to sensitive species (Section 6.2.1).

The proposed project is compatible with the City of Chula Vista and City of San Diego *MSCP Subarea Plans* because:

1. It is consistent with the adjacency guidelines contained in the *Subarea Plans* (see following Land Use Adjacency Guidelines section).
2. The trails and staging areas are located in the least sensitive areas of the MHPA and PMA. The proposed trails have minimized impacts to sensitive habitats by decreasing the number of existing and proposed trails from 30 miles to 8.3 miles, utilizing existing utility easements, and existing trails wherever possible. Impacts to all existing sensitive species have also been minimized.
3. The trails are located as close as possible to the edge of existing development as is practical. Equestrians will only be allowed on the eastern portion of the trail system located between Interstate 805 and Beyer Way. Most of the trail system is 300-500 feet from the riparian habitat, although, due to the need for connectivity between the northern and southern trails and to avoid steep hillsides, portions of the trails do infringe on the riparian habitat. The narrow linear nature of the OVRP prohibits complete avoidance. The trails would be maintained by removing manure prior to and during the rainy season. Additional maintenance would occur, as needed, to prevent the introduction of the brown-headed cowbird and the introduction of non-native plants to the MHPA and PMA.
4. The proposed trails are located within existing dirt roads where they are available.
5. The boundary between different habitat types (ecotones) has been avoided to the maximum extent possible.
6. Trail surfaces will not be paved with impervious surfaces.
7. Trail widths are consistent with the *OVRP Trail Guidelines* (see Attachment C) and have been minimized to the maximum extent practicable.
8. Where feasible, fences, barriers, and signage concerning limited access and litter control, will be placed along the edge of the trails in sensitive habitat areas.

9. Informational kiosks will be located in each staging area with educational information and brochures that address the sensitive nature of the vegetation within the OVRP and guidelines for appropriate trail usage.
10. Off-road vehicles usage will be prohibited on the trail system.
11. No equestrian staging areas are proposed.

Land Use Adjacency Guidelines

The proposed project site is located within and adjacent to the City of San Diego Multi-Habitat Planning Area (MHPA) and the City of Chula Vista Preserve Management Area (PMA). Therefore, the following Land Use Adjacency Guidelines will be made conditions of project approval. The following discussion addresses Section 1.4.3 of the *City of San Diego MSCP Subarea Plan* and Section 7.5.2 of the *City of Chula Vista MSCP Subarea Plan*. Implementation of the Land Use Adjacency Guidelines would reduce potential direct and indirect land use impacts to a less than significant level. All guidelines are applicable within the City of San Diego and the City of Chula Vista unless otherwise noted.

1. Prior to the first pre-construction meeting, all construction and staging area limits shall be clearly delineated with orange construction fencing to ensure that construction activity remains within the defined construction limits. A qualified biologist shall inspect the fencing prior to the start of construction and shall periodically monitor activities during construction to avoid unauthorized impacts and to insure that all biologically related permit conditions are complied with.
2. Staging (parking) areas #1 (Saturn Blvd.), #3 (27th St.), #5 (Del Monte Ave.), and #7 (Rios Ave.) will be located in existing disturbed or developed areas outside the City of San Diego MHPA and City of Chula Vista PMA, and drainage areas. These staging areas will not drain directly into the MHPA or PMA. Staging area #2 (Hollister St.) is proposed to be located at the northern edge of the City of San Diego MHPA, and would be adjacent to agricultural uses on the north and Hollister St. on the east. Staging area #4 (Beyer Blvd.) is proposed to be located at the southern edge of the City of San Diego MHPA, and would be adjacent to Beyer Blvd. and downslope from existing single-family residences. Staging area #6 (Mace Street) is proposed to be located in a disturbed area at the edge of the City of Chula Vista PMA, and would be adjacent to existing industrial activities on the north and east. All equipment and/or materials related to construction shall be stored in the staging areas. The location of the staging areas shall be reviewed and approved by the City of San Diego Environmental Review Manager and the City of Chula Vista Environmental Review Coordinator. A responsible party (i.e., construction manager, resident engineer) shall be identified to ensure that all construction crews and/or field workers comply with these measures.
3. The staging (parking) areas shall be surfaced with decomposed granite that will allow runoff to percolate into the ground as well as fuel and oil spilled from vehicles. The staging areas shall be surrounded by a planted area that is hydroseeded with a native plant mix. This planting area will absorb runoff similar to a grass-lined swale. The trails shall be surfaced with native soil, decomposed granite, or crushed rock which will clearly demarcate the trail boundaries and prevent degradation. The

native soil, decomposed granite, or crushed rock would prevent runoff from entering the waterways and allow for absorption of toxins from horse urine and manure from equestrian use of the trails. The staging areas and trails shall be monitored for erosion and problem areas that require additional measures including the use of stone or wood cross-joints or edge planting of native grasses to eliminate the effects of erosion.

4. All new lighting shall be shielded to prevent light spillover to adjacent MHPA areas. The shielding shall consist of fixtures that physically direct light away from adjacent MHPA and PMA areas.
5. If construction is planned within or adjacent to the MHPA and PMA during nighttime hours, lighting shall be directed and/or shielded to prevent light spillover to adjacent MHPA and PMA areas. The shielding shall consist of fixtures that physically direct light away from adjacent MHPA and PMA areas.
6. During nocturnal operation of any construction related dewatering pumps during shall require temporary berms or sound walls, or the relocation of the dewatering pumps outside the 160-foot noise “envelope” of any sensitive receptor. (Applicable in the City of San Diego).
7. The project contractor shall place all stationary construction equipment so that emitted noise is directed away from identified sensitive receptors.
8. The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction related noise sources and noise sensitive receptors. Construction staging areas shall not be located adjacent to residential land uses.
9. To avoid potential indirect construction noise impacts to sensitive bird species trail construction activities shall to the maximum extent practicable be restricted to following non-breeding periods in construction areas adjacent to the MHPA.
 - Coastal California gnatcatcher - August 15 to February 15
 - Light-footed clapper rail – August 1 to March 1
 - Least Bell’s vireo – September 15 to March 15
 - Raptors nesting in tall trees – July 31 to January 15
10. Trash and litter containers with lids shall be installed at the staging (parking) areas.
11. A *Trails and Staging Area Maintenance Plan* shall be implemented under the under the authority of the adopted *Joint Exercise of Powers Agreement* (JEPA) for the Otay Valley Regional Park (OVRP). The City of San Diego is responsible for the maintenance and management of the OVRP as indicated in the JEPA agreement. The maintenance shall comply with the requirements of the *Western OVRP Natural Resource Management Plan* and additional maintenance notes indicated on the draft conceptual plans (e.g. removal of trash, litter, and manure from the trails and staging areas).
12. Enforcement actions shall be taken to prevent and remove illegal intrusions, off-road vehicle activity, and illegal plant harvesting in the City of Chula Vista Preserve on an annual basis, as well as on a complaint basis. (Applicable in the City of Chula Vista).
13. The trails and staging areas located within the City of Chula Vista shall be required to meet NPDES standards and incorporate BMPs as defined by the City’s *Standard Urban Storm Mitigation Plan* (SUSMP). (Applicable in the City of Chula Vista).

14. Pursuant to the San Diego Regional Water Quality Control Board Municipal Permit, and the City of *Chula Vista Storm Water Management Standards Requirements Manual*, which includes the SUSMP, trails and staging areas located within or directly adjacent to or discharging directly to an environmentally sensitive area (as defined in the Municipal Permit and the Local SUSMP) are required to implement site design, source control, and treatment control BMPs. The BMPs shall, at a minimum, include:
 - Control post-development peak storm water runoff discharge rates and velocities to maintain or reduce pre-development downstream erosion and to protect stream habitat;
 - Conserve natural areas where feasible;
 - Minimize storm water pollutants of concern in runoff;
 - Remove pollutants of concern from urban runoff;
 - Protect slopes and channels from eroding;
 - Ensure that post-development runoff does not contain pollutant loads which cause or contribute to an exceedance of water quality objectives or which have not been reduced to the maximum extent practicable; and,
 - Implement BMPs close to pollutant sources.
(Applicable in the City of Chula Vista).
15. Invasive non-native plant species shall not be introduced into areas immediately adjacent to the MHPA and PMA. All open space slopes immediately adjacent to the MHPA and PMA should be planted with native species that reflect the adjacent native habitat. The plant list contained in Tables 4 and 5 above shall be used for hydroseeding in upland and riparian areas.
16. Equestrians shall be allowed on the portion of the trail system between Interstate 805 and Beyer Way. This portion of the trail would be maintained by removing manure prior to and during the rainy season. Additional maintenance would be required, as needed, to prevent the introduction of the brown-headed cowbird and the introduction of non-native plants to the MHPA and PMA.
17. Signage at the staging areas will identify trail access points and provide information about environmentally sensitive flora and fauna in the OVRP. Signage will be placed along selected trail segments to notify trail users to remain on the trail and away from sensitive species. Barriers such as peeler log fencing will be placed along sections of the trail adjacent to sensitive species.
18. All manufactured slopes will be located adjacent to the proposed project trails and staging areas.
19. Off-road and cross country vehicle activity will be prohibited on all trails constructed within the OVRP.

The proposed project complies with the *San Diego MSCP Subarea Plan* Public Access, Trails, and Recreation General Management Directives (*Section 1.5.2*) because:

1. Signage will clearly identify trail access points and peeler log fencing will be provided where necessary to protect sensitive biological resources.
2. The trails and staging areas would be located in the least environmentally sensitive areas by utilizing existing dirt roads and trails to the extent feasible and by avoiding locations between different habitat types (ecotones) wherever possible.

3. Trail surfaces will be native soil, decomposed granite, or crushed rock rather than paving.
4. Trail widths have been reduced to the minimum possible widths, consistent with the provisions of the *Otay Valley Regional Park Trail Guidelines* (see Attachment C) so as to minimize impacts to sensitive biological resources within the OVRP. Peeler log fencing will be installed along the trail sections that pass through the most sensitive habitats.
5. Off-road vehicle use will be prohibited on the proposed trails. The *OVRP Trail Project Conceptual Mitigation Plan* provides for the restoration of several disturbed areas, and the closure of existing informal trails.
6. The proposed project includes only trails and staging areas which are classified as a passive recreational use.
7. Use of the trails by hikers and equestrians, and an increased presence of Park Rangers, will discourage the use of OVRP for itinerant worker camps.
8. A *Trails and Staging Area Maintenance Plan* will be implemented as provided for in the adopted *Joint Exercise of Powers Agreement* (JEPA) for the Otay Valley Regional Park (OVRP). The City of San Diego is responsible for the maintenance and management of the OVRP. The maintenance plan will provide for the removal of trash, litter, and manure from the trails and staging (parking) areas on an ongoing basis.
9. Signage at the staging areas will include information concerning littering in the staging areas and on the trails. Trash container will be installed at each staging area.
10. Park Rangers will enforce regulations concerning littering, dumping, storage of materials (e.g. hazardous and toxic chemicals), and illegal intrusions into the MHPA (e.g. orchards, decks, etc.) within the OVRP area.
11. Cut and fill slopes resulting from the construction of trail segments 4, 10, 11, and unvegetated areas adjacent to the staging areas will be hydroseeded with seed mixes compatible with existing vegetation in the surrounding areas. Table 4 and 5 (see project description in this Initial Study) list the seed mixes to be used in upland and riparian areas. Mitigation measure BR-7c provides for an on-going maintenance program to remove manure prior to, and during, the rainy season to eliminate the introduction of non-native plant species from equestrian sources.
12. Mitigation measure BR-7c provides that a qualified biologist will periodically survey the project area to determine if the cowbird population increases. If an increase occurs, an appropriate cowbird trapping management plan will be implemented.

The proposed project complies with the Specific Management Policies and Directives for the Otay River Valley (*San Diego MSCP Subarea Plan Section 1.5.4*) because:

1. The highest priority directives for the Otay River Valley include the enhancement of the valley by the removal of exotics by both the City of San Diego and the City of Chula Vista. The *OVRP Trail Project Conceptual Mitigation Plan* for the proposed project includes a component for removal of a large stand of giant reed, identified in the *Draft OVRP Habitat Restoration Plan* (February 2006) as well as the closure and enhancement of several illegal trails. The priority directive for this section of the valley is:

“The City Park and Recreation Department has organized volunteer efforts in conjunction with the Police Department to remove exotics and underbrush in the valley. Illegal encampments and criminal activities in and adjacent to the valley spurred this effort in an attempt to control crime, improve public safety, and enhance the recreational and public uses of the valley. These stewardship activities should continue, along with continued police enforcement; monitoring/enforcement against poaching and vandalism should also occur. Remove brush during the non-breeding/nesting season, by selective pruning if possible rather than mechanical removal, leaving various amounts of native plant understory in areas that are more visually accessible.” (*City of San Diego MSCP Subarea Plan*, page 65.)

Implementation of the Trails and Staging Area Maintenance Plan as provided for in the adopted *Joint Exercise of Powers Agreement* (JEPA) for the Otay Valley Regional Park (OVRP) will supplement the existing volunteer efforts organized by the City Park and Recreation Department for stewardship activities in the OVRP. Implementation of the *OVRP Trail Project Conceptual Mitigation Plan* will remove non-native herbaceous and shrub species occupying the wetland restoration site. Large trees including pepper and *Myoporum* at the restoration site will also be removed.

The OVRP Trails project is included as a Planned Facility pursuant to Section 6.3.3.1, Table 6-1, in the *City of Chula Vista's MSCP Subarea Plan*. The Subarea Plan provides for flexibility in locating Planned and Future Facilities within the Preserve. To the extent practical, and as determined by the City, covered habitats and species will be avoided during the planning, design and construction of Planned Facilities. The proposed project complies with the Facilities Siting Criteria (Section 6.3.3.4) of the *City of Chula Vista MSCP Subarea Plan* because:

1. The staging areas and trails have been located along existing urban developments and utilize existing roads, trails, pathways and other disturbed areas to the greatest extent feasible, thereby minimizing habitat fragmentation and disruption of wildlife movement. The location of these facilities was determined in part by collaborative input from the OVRP Citizens Advisory Committee, reviewing existing aerial photos of the project area and conducting on-the-ground field surveys. Sensitive plant communities and habitats, including rare plant and narrow endemic surveys, were recorded using handheld GPS units, the results of which were plotted on aerial photos to ascertain the least environmentally impactful route.
2. Rare plant surveys (including surveys narrow endemics) and wetland delineations were conducted for the proposed project, the results of which are contained the *Otay Valley Regional Park Trails Project Biological Impact Analysis*. As discussed in that report, the project will not impact any narrow endemic species within the City of Chula Vista. Where impacts to wetlands were unavoidable due to the narrow, linear nature of the project, impacts were minimized by placing trails within existing roads, pathways, and other disturbed areas to the greatest extent practical. Impacts were further minimized through trail configuration and limited trail width. Determination of

wetland impacts and appropriate mitigation is consistent with the City of Chula Vista's Wetland Protection Program.

3. The project does not propose any new roads through the preserve. Additionally, the staging areas and trails have been located along existing urban developments and utilized existing roads, trails, pathways and other disturbed areas to the greatest extent feasible, thereby minimizing habitat fragmentation and disruption of wildlife movement.
4. The proposed OVRP Trails project is included as a Planned Facility pursuant to Section 6.3.3.1, Table 6-1, and the *City of Chula Vista MSCP Subarea Plan*. Take Authorization for the proposed project is expressly provided for through the *City of Chula Vista MSCP Subarea Plan* provided that the design plans and supporting environmental documents adequately demonstrate consistency with the OVRP Concept Plan and the provisions of the *City of Chula Vista MSCP Subarea Plan* Section 6.3.3.4 (Facilities Siting Criteria), Section 7.5 (City Planning Component Framework Management Plan), Section 7.5.3 (Public Access, Trails and Recreation Guidelines), and Section 7.6.3 (Otay River Valley Framework Management Plan).
5. Quino Checkerspot Butterflies (QCB) was not detected during the biological surveys conducted for the proposed project. Subsequent protocol surveys were not performed due to the absence of suitable habitat.

The proposed project complies with the City of Chula Vista MSCP Component Public Access, Trails and Recreation (Section 7.5.3) because:

1. The adopted *City of Chula Vista Greenbelt Master Plan* (2003) includes the conceptual location of trails within the Preserve, guidelines for trail construction, and guidelines for hiking and equestrian staging areas; however, the master plan defers to the Otay Valley Regional Park planning effort to address these features, given the established tri-jurisdictional agreements that include a public participation component.
2. Consistency with the City of Chula Vista's Adjacency Management Guidelines (CCV MSCP Subarea Plan, Section 7.5.2) is detailed in the preceding Land Use Adjacency Guidelines discussion, which includes a detailed discussion outlining the implementation of the City of Chula Vista's adjacency management guidelines related to noise, lighting, drainage, litter removal, and control of invasive plant species.
3. The staging areas and trails have been located along existing urban developments and utilize existing roads, trails, pathways and other disturbed areas to the greatest extent feasible, thereby minimizing habitat fragmentation and disruption of wildlife movement.
4. No paving of staging areas or trails is proposed under this project. Staging areas will be surfaced with decomposed granite and trail surfaces will consist of native soil, decomposed granite, or crushed rock. The proposed project will utilize existing roads, trails, pathways and other disturbed areas to the greatest extent feasible. The City of San Diego is responsible for the overall maintenance and monitoring of the OVRP under the authority of the *Joint Exercise Powers Agreement* (JEPA) for the OVRP.

5. Trail fences, signage, and/or other barriers have been made a condition of the project in areas where sensitive biological resources have been identified and are to be avoided. Additionally, trail width has been reduced to 4 feet in areas where sensitive biological resources have been identified. The staging area and trails have been located along existing urban developments and utilized existing roads, trails, pathways, and other disturbed areas to the greatest extent feasible, thereby minimizing habitat fragmentation and disruption of wildlife movement.
6. The trails, which are planned for multiple uses (i.e., hiking, biking, equestrian, etc.), have been located along existing urban developments and utilized existing roads, trails, pathways and other disturbed areas to the greatest extent feasible. No equestrian staging areas are included as part of this project.
7. The western segment of the OVRP Trails Project (I5 to I805) does not contain any finger canyons.
8. The project includes signs to be placed at access points (staging areas) to the trail system, consistent with the Otay Valley Regional Park Trails Guidelines.
9. Off-road vehicle activity is not included in the proposed project.
10. Trail reclamation areas and trail closures have been made a condition of the project (refer to Table 8, Initial Study Checklist). Restoration activities and trail closures will be performed in accordance with the *OVRP Trail Project Conceptual Mitigation Plan*.

The proposed project complies with the *City of Chula Vista MSCP Otay River Valley Framework Management Plan* (Section 7.6.3) because:

1. The project is consistent with guidelines and provisions of the *Draft Otay Valley Regional Park Habitat Restoration Plan*.
2. A Master Revegetation Plan for wetland and upland habitat types for the entire OVRP has not been prepared to date; however, mitigation for impacts of the trails project are addressed within the *Conceptual Wetlands Restoration Plan*, and is also consistent with the *Draft OVRP Habitat Restoration Plan*.
3. The staging areas and trails have been located along existing urban developments and utilize existing roads, trails, pathways and other disturbed areas to the greatest extent feasible, thereby minimizing habitat fragmentation and disruption of wildlife movement.
4. Consistency with the City of Chula Vista's Adjacency Management Guidelines (CCV MSCP Subarea Plan, Section 7.5.2) is detailed in preceding Land Use Adjacency Guidelines discussion. The Land Use and Planning Section of the checklist provide a detailed discussion outlining the implementation of the City of Chula Vista's adjacency management guidelines related to noise, lighting, drainage, litter removal, and control of invasive plant species.
5. The proposed project includes measures that mitigate for project impacts, including removal of invasive non-native plant species where necessary; however, other removal efforts for the OVRP are not a part of this project.
6. The OVRP JEPA includes a process for the coordination of management activities between the affected jurisdictions that includes the installation of signage and fences/barriers along designated sensitive habitat areas. The design for signs and

staging areas for the proposed project was developed through input from the JEPA process.

7. This segment of the OVRP Trails Project does not contain any finger canyons that are a tributary to Wolf Canyon.
8. A Master Revegetation Plan for the OVRP has not been prepared at this point. The proposed project is not inconsistent with the goal of preparing a revegetation plan in the future.
9. The OVRP JEPA includes a process for the coordination of management activities between the effected jurisdictions that includes the installation of signage, fences, staging areas/parking lots and other public use facilities. The design for signs and staging areas for this Trails Project was developed through input from the JEPA process.
10. Trail fences, signage, and/or other barriers have been made a condition of the project in areas where sensitive biological resources have been identified and are to be avoided.

X. MINERAL RESOURCES -- Would the project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project site has been classified by the *California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997)* as an area of “Identified Mineral Resource Significance” (MRZ-2). Most of the valley floor has been mined in the past and two batch plant operations currently exist in the valley. One batch plant is located in the river channel between Hollister Street and Beyer Boulevard. The second plant is east of Beyer Boulevard and north of the river channel. The proposed project would not interfere with the existing operations because the trails would be located outside of the batch plant operational areas.

- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Development of a linear trail system within the OVRP boundaries would not preclude the continued operation of the existing batch plant operations or preclude mineral extractions elsewhere in the valley. However, the OVRP proposed project site is designed as Open Space and Special Study Area by the City of San Diego and Open Space by the City of Chula Vista. These designations do not provide for extractive uses and the *Otay Mesa-Nestor Community Plan* strongly discourages an extension of the Conditional Use Permits for the two batch plants operating in the valley.

XI. NOISE -- Would the project result in:

- a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless
Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: The proposed project is a hiking, biking, and equestrian trail system within the OVRP and staging areas at the perimeter of the OVRP. The trails would not include any noise-generating equipment. Human activity on the trails and the staging areas would be dispersed throughout the length of the 8±-mile long trail system and at 7 staging areas. The vehicular access gates at the staging areas shall be closed during the nighttime hours. The use of the trails is limited to hikers, bicyclists, and equestrians. Motorcycles and off-road vehicles are not a permitted use on the trails or in the staging areas.

The majority of the trails and staging areas are located a minimum of 250 feet from the nearest residential area. Trails and staging areas less than 250 feet from the nearest residential area are identified as follows.

- Staging Area #1 and the end of trail segment 1A are adjacent to a commercial use (Home Depot) and the nearest residential use is approximately 100 feet to the west across Saturn Boulevard.
- Staging Area #4 is approximately 150 feet north of and 60 feet below the nearest residence.
- Staging area #5 and the end of trail segment 10 are 100 feet west of the nearest residence located on the east side of Del Monte Avenue.
- A 300-foot long section of trail segment 14A will be 25 to 40 feet south of 2 residences located at the end of Palm Avenue.
- The access drive to Staging Area #7 is adjacent to 3 residences at the end of Rios Drive, but the Staging Area and the end of trail segment 13 are approximately 40 feet south of the nearest residence.
- A 200-foot long portion of trail segment #11 leading to the Finney School will be 50 to 100 feet from the nearest residence. The next 400-foot long segment of the trail will be 200 to 250 feet north of and 40 to 100 feet below the nearest residences.

The remaining staging areas are adjacent to commercial, industrial, or agricultural activities.

The surface of the parking lots at staging areas shall be decomposed granite rather than paving so tire noise will be minimized. The level of human activity at staging areas #1-#3 and #5-#7 will be low to moderate at any one time because each site

contains 10 parking spaces, 1 picnic table, and 1 port-a-john, and no recreational facilities. The level of activity at staging area #4 will be slightly higher because it will contain a Park Ranger office building, a restroom, and 4 picnic tables at dispersed locations.

Given the level of daytime human activity at the staging areas and on the trails, the proposed project will not expose people to, or generate, noise levels that exceed the allowable limits of the City of San Diego and City of Chula Vista *General Plan Noise Elements* or *Noise Ordinances*, and other applicable local, State, and Federal noise control regulations. Therefore, the proposed project will not expose people to, or generate, noise levels that exceed the allowable limits of the San Diego and Chula Vista *General Plan Noise Elements* or *Noise Ordinances*, and other applicable local, State, and Federal noise control regulations.

The proposed project's conformance to the *City of San Diego and City of Chula Vista Noise Elements and Noise Ordinances* ensures the trail system and staging areas will not create cumulatively considerable noise impacts because the proposed project will not exceed the local noise standards for noise sensitive areas, and the proposed project will not exceed the applicable noise level limits at the property line or construction noise limits, derived from State regulation to address human health and quality of life concerns. Therefore, the proposed project will not contribute to a cumulatively considerable exposure of persons or generation of noise levels in excess of standards established in the local general plan, noise ordinance, and applicable standards of other agencies.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

- | | |
|------------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant Impact with Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project does not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels.

- Buildings where low ambient vibration is essential for interior operation, including research and manufacturing facilities with special vibration constraints.
- Residences and buildings where people normally sleep including hotels, hospitals, residences and where low ambient vibration is preferred.
- Civic and institutional land uses including schools, churches, libraries, other institutions, and quiet office where low ambient vibration is preferred.
- Concert halls for symphonies or other special use facilities where low ambient vibration is preferred.

Also, the proposed project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area.

- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is a hiking, biking, and equestrian trail system facility that does not include any noise-generating equipment. Therefore, the proposed project would not result in a substantial permanent increase in existing ambient noise levels in the proposed project vicinity.

- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is a hiking, biking, and equestrian trail system including 7 staging (parking) areas, ranger station, and crossings of the Otay River and tributary streams that does not include any noise-generating equipment. Temporary construction noise increases above existing ambient levels are not expected to exceed the construction noise limits of the City of Chula Vista and San Diego Noise Ordinances, which are derived from State regulation to address human health and quality of life concerns. Construction operations will occur only during permitted hours of operation pursuant to the Noise Ordinances. Also, it is not anticipated that the proposed project will operate construction equipment in excess of 75 dB for more than an 8 hours during a 24-hour period. Therefore, the proposed project would not result in a substantial temporary or periodic increase in existing ambient noise levels in the proposed project vicinity.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would

the project expose people residing or working in the project area to excessive noise levels?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless
Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: The proposed project is not located within a *Comprehensive Land Use Plan* (CLUP) for airports or within 2 miles of a public airport or public use airport. Therefore, the proposed project will not expose people residing or working in the proposed project area to excessive airport-related noise levels.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless
Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: The proposed project is not located within a one-mile vicinity of a private airstrip; therefore, the proposed project will not expose people residing or working in the proposed project area to excessive airport-related noise levels.

XII. POPULATION AND HOUSING -- Would the project:

- a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project will not induce substantial population growth in the area because the proposed project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area including, but not limited to the following: new or extended infrastructure; new commercial or industrial facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, specific plan amendments, zone reclassifications, sewer or water annexations; or LAFCO annexation actions.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project will not displace any existing housing since the site is currently vacant.

- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project will not displace a substantial number of people since the site is currently vacant.

XIII. PUBLIC SERVICES

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:

- i. Fire protection?
- ii. Police protection?
- iii. Schools?
- iv. Parks?
- v. Other public facilities?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: The proposed project would not require new fire, police, schools, park, or other public facilities. The proposed project does not involve the construction of new or physically altered governmental facilities including, but not limited to, fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times or other performance service ratios or objectives for any public services. Therefore, the proposed project will not have an adverse physical effect on the environment because the proposed project does not require new or significantly altered services or facilities to be constructed.

XIV. RECREATION

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: The proposed project would increase public accessibility to the Otay River Valley and enhance the usefulness of the Otay Valley Regional Park to the residents of the South Bay area. Implementation of the proposed project will include a trail maintenance program that does not currently exist, and will result in the closure of existing informal trails throughout the OVRP. The formalization of an established trail system with fencing and signage at selected locations will provide an increased level of

protection for sensitive habitats by directing trail users to the area containing the least sensitive habitats. Construction of the trails and staging areas will include appropriate drainage facilities that correct existing deficiencies within the OVRP and avoid future erosion associated with trail usage.

The proposed project also includes the construction of a ranger station at Beyer Boulevard which will provide a point of contact between Park Rangers and trail users. An increased level of Park Ranger patrols and presence within the OVRP will decrease unauthorized activities such as off-road vehicle usage and trash dumping.

- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

☐ Potentially Significant Impact

☒ Less than Significant Impact

☐ Potentially Significant Unless
Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The proposed project is the construction of a formalized trail system using existing informal trails, utility easement roads, and the construction of approximately 8 miles (43,760± feet) of new trails. However, as outlined in this Environmental Analysis Form Section I-XVII, the construction of the trail system will not result in adverse physical effect on the environment.

XV. TRANSPORTATION/TRAFFIC -- Would the project:

- a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

☐ Potentially Significant Impact

☒ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Less Than Significant: The County of San Diego Department of Public Works (Traffic Engineering) performed a focused traffic impact assessment for the proposed project (see Attachment D). The proposed staging areas at Saturn Boulevard, Hollister Street, 27th Street, Mace Street, and Rios Avenue will accommodate between 10 and the Beyer Boulevard staging area will accommodate 12 vehicles. Regional access to the staging areas is provided via I-805 and I-5.

The traffic assessment assumed that users of the staging areas would stay for at least one hour to utilize the trail network. Local residents in the area would also use the trail network but given the proximity of residents many would walk to the nearest trail head and their access to the trail network would not necessitate a vehicular trip. Conservatively, it was assumed that the staging areas would, on average, fill to capacity twice daily, thus servicing 20 to 24 vehicles a day. Two trips per vehicle were assumed (one inbound trip and one outbound trip) for a range of 40 to 48 trips per staging area. For purposes of the traffic impact analysis a conservative trip generation rate of 50 trips per staging area was assumed. Recreational trips will peak during weekends and holidays and reduced usage will occur on the typical weekday. Very few trips will occur during the weekday peak periods.

Project trips were assigned onto the local road network as shown in Attachment D, Figure 1. Existing traffic counts for roads in the vicinity of the proposed staging areas are summarized in Table 1 and depicted in Figure 2 (see Attachment D). Based upon the number of travel lanes, level of service was estimated for each of the roads (see Table 1). The existing conditions summary indicated that all roads in the vicinity of the proposed project are operating at LOS D or better. The existing plus project traffic volumes and levels of service are also summarized in Table 1. Under existing plus project conditions all roads in the vicinity of the proposed project will operate at LOS D or better.

The proposed project will not add more than 125 trips to any road segment. Given the small number of project trips and LOS D or better conditions before and after the implementation of the proposed project, the proposed project will not exceed traffic impact thresholds used by the County of San Diego, City of San Diego or City of Chula Vista. Implementation of the proposed project will not result in a significant traffic impact to the existing road network.

- b) Exceed, either individually or cumulatively, a level of service standard established by the County congestion management agency for designated roads or highways?

- | | |
|---------------------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant: A summary of future traffic volumes (2030) in the vicinity of the proposed project is provided in Table 2 and depicted in Figure 3 (Attachment D). All but three roads are projected to operate at LOS D or better; the three exceptions include Hollister Street, Palm Avenue and two segments of Main Street. In 2030, projected levels of service for these roads would be the same with or without the proposed project. Hollister Street, between Main Street and Palm Avenue is projected to operate at LOS F. Palm Avenue, between Beyer Way and Piccard Avenue, and the two segments of Main Street, the first between I-5 and Hollister and the second between Hilltop and I-805, are projected to operate at LOS E.

The proposed project will add less than 100 trips to Circulation Element roads projected to operate at LOS F and less than 200 trips to Circulation Element Roads projected to operate at LOS E. The proposed project will not cause the traffic impact threshold guidelines established by the County of San Diego, City of San Diego or City of Chula Vista to be exceeded. The proposed project will not prevent the planned Circulation Element road system from operating at its planned level of service at buildout. Implementation of the proposed project will not result in a significant traffic impact to the planned road network.

- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is located outside of an Airport Master Plan Zone and is not adjacent to any public or private airports; therefore, the proposed project will not result in a change in air traffic patterns.

- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

- | | |
|---------------------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant: The proposed project will not significantly alter traffic safety on Saturn Boulevard, Hollister Street, Beyer Boulevard (including Fenton Pond staging area), 27th Street, Mace Street, or Rios Avenue. A safe and adequate site distance will be provided at all staging area driveway entrances to the satisfaction of the Director of the Department of Public Works of the City of San Diego and City of Chula Vista. Parking lot improvements will be constructed to the satisfaction of the City of San Diego and City of Chula Vista Engineer. The proposed project will not place incompatible uses (e.g., farm equipment) on existing roadways. Therefore, the proposed project will not significantly increase hazards due to design features or incompatible uses.

e) Result in inadequate emergency access?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project will not result in inadequate emergency access. The City of San Diego and City of Chula Vista Fire Departments have reviewed the proposed project and has determined that there is adequate emergency fire access.

f) Result in inadequate parking capacity?

- | | |
|---------------------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The City of San Diego Land Development Code (Municipal Code Chapter 14, Article 2, Division 5) and the City of Chula Vista Zoning Ordinance (Municipal Code, Title 19, Chapter 19.62) do not establish parking space requirements for uses such as the proposed hiking, biking, and equestrian trail system in the OVRP. Seventy-two parking spaces distributed in 7 staging areas located at the perimeter of the OVRP has been determined by the City of San Diego Park and Recreation Department and the City of Chula Vista Planning Department to provide an adequate number of parking spaces based on the anticipated level of usage of the trail system.

g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless
Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: The proposed project is a hiking, biking, and equestrian trail system in the OVRP, and 7 adjacent staging areas. The implementation will not result in any construction of new road design features; therefore, it will not conflict with policies regarding alternative transportation.

XVI. UTILITIES AND SERVICE SYSTEMS -- Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: The only facility that would be connected to the City of San Diego sanitary sewer system is the Ranger Station located at Staging Area #4. One employee restroom and two public restrooms would be provided at the Ranger Station. These restrooms would not exceed the wastewater treatment requirements of the Regional Water Quality Control Board. A port-a-john will be located at the other six staging areas. No sanitary sewer facilities (septic) are proposed on the trail system.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: Water and sewer lines would be extended from the existing lines in Beyer Boulevard adjacent to Ranger Station #4. Extending water and sewer lines to the Ranger Station from the existing lines would not result in significant environmental effects. The area between the existing lines and the proposed location of the Ranger Station is developed or devoid of known sensitive resources. No other new facilities would be required.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☒ Potentially Significant Unless Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Potentially Significant Unless Mitigation Incorporated: Twelve drainage crossings will be modified, enhanced, or created as components of the proposed project, including 4 puncheon crossings (#2, #9, #12, #13), 1 stand-alone box culvert (#8), 5 raised trail causeways with culverts (#3, #4, #6, #7, #11), 1 raised trail causeway (#10), and one bridge (#14) (see Table 1). Crossings #1 and #5 would not be modified by the proposed project. All crossings, with the exception of the Poggi Creek Bridge (#14) and the box culvert east of Beyer Boulevard (#8) are currently being used as unauthorized crossings without the streambed and stream bank protection these drainage crossings would provide.

Puncheon Crossings

The puncheon crossings (Figure A) consist of mudsills or redwood planks that are secured to the riverbank at trail level. Two or three stringers span across the drainage from the mudsills on each bank and support wooden decking (see typical plan and section details). The puncheon deck section is comprised of 4-foot wide treads with a maximum free span of 11 feet between the inside of the sill timbers.

Puncheon crossings are intended to span the low flow channel and would not exceed the width of the trail. These crossings are bridge structures that can be removed seasonally by ranger staff. Puncheon crossings would require regular maintenance to remove and replace timbers seasonally and when worn.

Puncheon crossings typically span the entire width of jurisdictional waters and thus do not result in fill within watercourses. However, due to the limited span that can be achieved with this crossing type, some of the puncheon crossings do include small abutment fills to narrow the crossing. This is the case at puncheon crossing (#2) which is associated with a raised trail causeway. In most instances, the puncheon crossings are to be located over small, unvegetated channel sections.

Round Culvert Crossings

Crossings #3, #4, #6, #7, and #11 would be constructed as raised trail causeways with culverts (Figure B). This type of crossing is utilized in seasonally or permanently wet areas and allows low velocity water flow to pass from one side of the trail to the other. It consists of riprap deposited on the bottom, finer gravel as it is built up, and an all weather trail surface on the top of the causeway. The placement and elevation of the culverts will allow the larger storm events to overflow the crossings without affecting the path of the existing stream or river. Consequently, the larger storm events will not cause diversion of the watercourse, only overtopping of the trail itself. A porous riprap will be utilized for the construction of the raised trail causeways with culverts.

Box Culvert Crossings

There are 4 proposed box culverts (#3, #6, #8 and #11, Figure C). The box culvert is a cast-in-place reinforced concrete box culvert and would result in both temporary and permanent impacts to the streambed and surrounding vegetation. Access for installation of the culvert can be made from existing roadways or constructed trails,

although some additional temporary impacts would occur during installation of the culvert.

Temporary drainage dewatering and rerouting will occur during the construction of the cast-in-place box culverts on all crossings with the exception of Crossing #6, which is located in a seasonal drainage. There is a double culvert and raised trail crossing (#4) about 150 feet in length proposed just west of Fenton Pond where an unnamed tributary feeds into the pond. The current culvert in this location is inadequate and would be replaced. The proposed culverts would be metal and would be covered with riprap causing a permanent impact to the streambed. Direct impacts to the surrounding vegetation would exceed the trail width to accommodate a 2:1 slope for the raised trail causeway.

Elevated Causeways

The raised trail causeways (Figure D) that are not combined with actual puncheon crossings or culverts do not occur in incised river or drainage channels but rather in the floodplain. These causeways would be a permanent impact to the floodplain and would exceed the trail width to accommodate the 2:1 slope on either side of the trail. One raised causeway would be installed just west of Beyer Way (#7) in a seasonally inundated floodplain. This would have 12" culverts every 50 feet and at low spots along the causeway to allow for increased water flow during the wet season. The second causeway would be located west of Finney Point (#10) in an area of recent, but perennial flooding at the bottom of the cliffs. This portion of the trail is now permanently inundated with at least one foot of water. It is unclear why the water has pooled here and it may retract from the area once nonnative vegetation is removed from the watershed (a plan currently in the early planning stages) and normal hydrology returns. Alternatives to this trail were examined and rejected, either due to the steep slope to the south or the broad riparian vegetated floodplain to the north.

There is an additional raised trail causeway (A) that occurs in a seasonally wet or muddy area of the valley just east of Beyer Boulevard. This trail segment is not included as a crossing because it occurs in an area that retains rainwater rather than occurring within the floodplain.

Poggi Creek Bridge Crossing

Crossing #14 is proposed as a bridge (Figure E) over Poggi Creek. The proposed prefabricated steel truss bridge would be approximately 13 feet wide and 60 feet long. The bridge would have timber decking and tubular steel sides. Footings at each end of the bridge would be located outside of delineated wetlands and the 100-year floodway, but would be within the 100-year floodplain. The bridge has been designed so that it would not result in a rise of the 100-year flood elevation and the lowest bridge support beam would be above the high water level. Due to the potential for scouring in this area, riprap would be placed along the sides of the channel for running distance of 35 feet in the area of the bridge. Direct impacts would occur where the riprap is placed within the channel. Temporary impacts to vegetation would occur with the installation of the bridge and during the placement of riprap within the channel.

Mitigation for this impact is covered through the mitigation to biological resources, BR-8, BR-9, BR-10, BR-11a, and BR-11b. Therefore, no additional mitigation measures are necessary as the previous mitigation measures mitigate the impacts to below significant.

- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The only water service required by the proposed project is for the Ranger Station located at Staging Area #4. The City of San Diego has determined that adequate water service for the Ranger Station is available from the water lines in Beyer Boulevard.

- e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The City of San Diego has determined that adequate wastewater capacity is available to serve the Ranger Station at Staging Area #4. No other wastewater service is required by the proposed project.

- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

- | | |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project is the construction of a system of hiking, biking, and equestrian trails, and 7 staging (parking) areas which are passive recreation uses. A trash receptacle and recyclable receptacle will be located at each staging area, except Staging Area #4 which will have 2 sets of trash and recycling bins. As noted in the

MHPA Land Use Adjacency Guidelines (see Section IX. LAND USE AND PLANNING) a Trails and Staging Area Maintenance Plan shall be implemented under the authority of the *Joint Exercise of Powers Agreement (JEPA) for the Otay Valley Regional Park (OVRP)*. The maintenance plan will provide for the removal of trash, litter, and manure from the trails and staging (parking) areas on an as-needed basis.

The quantity of solid waste that would be generated by the proposed hiking, biking, and equestrian trails, and staging areas would be reduced to the extent that recyclable materials are deposited in the recyclable bins and removed from the waste stream. The quantity of solid waste generated by the proposed project is not anticipated to place a burden on the existing permitted capacity of any landfill or transfer station within San Diego County.

- a) Comply with federal, state, and local statutes and regulations related to solid waste?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☒ No Impact

Discussion/Explanation:

No Impact: The collection and disposal of solid waste from the trail system and staging areas would be conducted in compliance with the adopted *Western OVRP Natural Resource Management Plan*, *OVRP Trails Guidelines*, and the County-wide *Integrated Waste Management Plan*. No hazardous wastes are anticipated to be generated by the proposed project. Consequently, the proposed project will comply with all Federal, State, and local statutes and regulations related to solid waste.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE:

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

☐ Potentially Significant Impact

☐ Less than Significant Impact

☒ Potentially Significant Unless Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: The proposed project has the potential to significantly impact the environment. Though the proposed project would reduce habitat for fish and wildlife species during construction, the mitigation measures

would reduce that impact to below significant. This mitigation includes: (1) transplanting San Diego barrel cactus, (2) avoidance of construction during avian breeding seasons, (3) preservation of sensitive vegetation communities, (4) restoration of closed trails, and (5) creation of wetlands, (6) monitoring of construction activities and recovery of archaeological and paleontological resources found during excavation activities. As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this project would result. Therefore, this proposed project has been determined not to meet this Mandatory Finding of Significance.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

☐ Potentially Significant Impact

☒ Less than Significant Impact

☐ Potentially Significant Unless Mitigation Incorporated

☐ No Impact

Discussion/Explanation:

The following list of past, present and future projects were considered and evaluated as a part of this Initial Study:

Project files in the City of San Diego, City of Chula Vista, and County of San Diego were reviewed for past, present, and future project located in the Otay River watershed from San Diego Bay to the Lower Otay Reservoir. A brief description of cumulatively related projects is included in the following section.

Finney Interpretive Overlook (City of San Diego)

The Finney Interpretive Overlook is located on the south side of the OVRP and overlooks the Otay River Valley west of I-805. Trail segment 11 provides a connection from the proposed project trails to the overlook. This overlook is a viewpoint/overlook in the *OVRP Concept Plan* and construction was completed in summer 2005 and was statutorily exempt from CEQA. Finney Overlook is adjacent to the existing Chula Vista Elementary School (Thomas Bros: 1330, F-6), and is north of Byrd Street and west of Rickenbaker Avenue. The Finney Interpretive Overlook includes an access ramp and walkway, two small amphitheatres with interpretive shade structures, benches, tables, and landscaping. Landscaping consists of native or non-invasive plants adjacent to the MHPA. Fencing around the overlook consists of two-rail lodge pole. The design of the Overlook did not alter the existing drainage system nor require grading. The Overlook footprint is less than 5,000 sq.ft. and over 80% of the site is planted with native vegetation. No parking is provided as part of the Overlook, and pervious materials are used for pathways and trails constructed as part of the Overlook. No new lighting will be required for the overlook trail.

Lonestar Residential Development (City of San Diego)

The Lonestar development is located northeast of Brown Field near Johnson Canyon (Thomas Bros: 1331,G-7). This 312-acre site is proposed to be developed 1,500 single- and multi-family units. The site is located outside of the City of San Diego MHPA, but would be required to comply with the Land Adjacency Guidelines of the *City of San Diego MSCP Subarea Plan* (Section 1.4.3). Access to the Lonestar development would be from I-905 via La Media Road.

Otay Corporate Center North (City of San Diego)

This 179-acre site has been approved for development as an industrial park. The site is located approximately 1 ¼-mile east of I-805 and approximately 1 ¼-mile south of the Otay River Valley (Thomas Bros: 1351, A-1). The site is near the west rim of Dennerly Canyon that drains to the Otay River Valley. The site is adjacent to City of San Diego MHPA, and is required to comply with the *City of San Diego MSCP Subarea Plan* MHPA Guidelines (Section 1.2.1), and the Land Adjacency Guidelines of the (Section 1.4.3). Access to the site is from I-905 via Caliente Avenue. Several existing residential developments are located between the Otay Corporate Center North site and the Otay River Valley.

California Terraces (City of San Diego)

This 665-acre site has been approved for development of 4,118 residential units that are under construction. The site is located approximately ¾-mile east of I-805 and approximately 1 ¼-mile south of the Otay River Valley (Thomas Bros: 1350, J-1). The remaining development area within California Terraces is near I-905. The site is adjacent to City of San Diego MHPA, and is required to comply with the *City of San Diego MSCP Subarea Plan* MHPA Guidelines (Section 1.2.1), and the Land Adjacency Guidelines of the (Section 1.4.3). Access to the site is from I-905 via Caliente Avenue. Several existing residential developments are located between the California Terraces and the Otay River Valley.

Sunroad Tech Center (County of San Diego)

The Sunroad Tech Center is located northeast of Brown Field near Harvest Road (Thomas Bros: 1331,J-7). This 253-acre site has been approved for development as a 96-lot industrial park in 2003. The site is located approximately 5 miles east of I-805 and approximately 1-mile south of the Otay River Valley. The site is near the west rim of Johnson Canyon that drains to the Otay River Valley. The site is identified as an "Area Not Preserved" on the *County of San Diego MSCP Subarea Plan*. Access to the site is from I-905 via Sanyo Avenue. The project was conditioned to mitigate impacts to non-native grassland (54 acres) through the preservation of equivalent habitat in an off-site location. Implementation of the "Resource Conservation Plan" for the preservation of other on-site resources (Diegan coastal sage scrub, native grassland, and wetlands) was also included as a condition of approval.

Otay Ranch (County of San Diego/City of Chula Vista)

The Otay Ranch General Plan Amendment was approved by the County Board of Supervisors in 1994. The project proposed 24,000 dwelling units on approximately 23,000 acres, and includes 13,000 acres of onsite open space to be managed by the Otay Ranch Preserve-Owner Manager, an agreement between the City of Chula Vista and the County of San Diego. The Otay Valley Parcel (9,450 acres) was annexed to the City of Chula Vista. This area is bounded by Telegraph Canyon Road on the north, Heritage Road on the west, Brown Field on the South, and Lower Otay Lake on the east.

A Resource Management Plan (RMP) was approved that establishes an open space system that includes the highest value resource areas as preserved lands and concentrates development in disturbed habitat or agricultural areas. The goal of the RMP is preservation of open space that will protect and enhance the multiple resources found within the Otay Ranch. A master drainage plan is required for each drainage basin that specifies drainage infrastructure, staging and development details, timing, financing, and responsibility for drainage impacts.

Otay River Watershed Management Plan (County of San Diego and incorporated areas)

The purpose of the Otay River Watershed Management Plan (ORWMP) is to develop a comprehensive framework management plan to guide this watershed's future. With the population and housing in this watershed expected to nearly double in the next 25 years there will be a variety of land use changes. The ORWMP, in consideration of the applicable general plans and other resource and land-use plans and programs, provides a key vehicle for planning for on-going watershed uses, source water protection, and other resource protection, enhancement, and restoration. To achieve this purpose, the ORWMP consists of several elements:

- Characterizing the watershed's various natural resources and land uses;
- Identifying key goals;
- Assessing and prioritizing threats to existing beneficial uses and natural resources;
- Identifying strategies for the protection, enhancement, and restoration of beneficial uses and natural resources in the watershed, including source water protection, and a water quality monitoring strategy;

- Providing adaptive management strategies and objectives to monitor and evaluate the effectiveness of the strategies and propose potential remedial actions; and
- Preparing the ORWMP so that it can be easily updated to reflect changes in physical, biological, chemical, land use, and regulatory conditions.

At its inception and over time, the ORWMP is intended to be consistent with the applicable local General Plans, local resource plans and programs, the Otay River Watershed Special Area Management Plan (SAMP), the Municipal Permit (San Diego Region National Pollutant Discharge Elimination System [NPDES] General Permit Order No. 2001-01). Specifically, the ORWMP provides implementation strategies intended to assure high water quality standards and to protect aquatic and upland resources in this watershed. Unlike the SAMP, the ORWMP is not meant to provide regulatory mechanisms; rather, it is to serve as a programmatic advisory document for decision-makers to use as a tool. Each participating jurisdiction may have different needs and land use considerations, and therefore, the ORWMP strategies are only recommendations that may need to be refined further for each jurisdiction.

Less Than Significant Impact: The evaluation of the questions in Sections I through XVI considered the potential for the proposed project to result in “cumulatively considerable” impacts when comprehensively evaluated with the 7 cumulatively related projects identified above. This evaluation determined that there is a potential for cumulatively significant biological effects to result from implementation of the proposed project. However, project design considerations and mitigation measures have been included as project conditions of approval of this proposed project, and the other development projects listed that will reduce these potential cumulative effects to a less than significant level. Also of note is the preliminary approval of the Otay River Watershed Management Plan, and the adopted Multiple Species Conservation Programs in the County of San Diego and Cities of Chula Vista and San Diego. These regional planning efforts will reduce potential negative effects from future probably projects.

The project is intended to reduce, direct, and formalize the trail system within the western OVRP to reduce impacts to the Otay River Valley as well as its sensitive habitats and species. Mitigation measures proposed include: (1) preservation of San Diego barrel cactus, (2) noise reduction measures to protect sensitive avian species if grading and construction must be completed during the breeding season, (3) cowbird trapping program, (4) maintenance program to prevent accumulation of trash, litter, and manure, (4) enforcement actions to prevent intrusions into sensitive habitat areas, (5) compensate for the loss of Diegan coastal sage scrub and non-native grassland through the restoration of ruderal habitat, (6) compensate for the loss of wetlands by creating additional wetlands adjacent to existing wetland areas and enhancement of existing disturbed wetland areas.

- c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated

- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

Less than Significant: In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in sections I. Aesthetics, III. Air Quality, VI. Geology and Soils, VII. Hazards and Hazardous Materials, VIII Hydrology and Water Quality, XI. Noise, XII. Population and Housing, and XV. Transportation and Traffic. As a result of this evaluation, there is no substantial evidence that there are adverse effects on human beings associated with this proposed project. The proposed project will promote healthy activities such as hiking, horseback riding, and bicycling. In addition, it provides users with the opportunity to view wildlife, enjoy the outdoors, and educate current and future generation about the importance of the environment through education and outreach activities that could be developed in the OVRP. Therefore, this proposed project has been determined not to meet this Mandatory Finding of Significance.

XVIII. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

All references to Federal, State and local regulation are available on the Internet. For Federal regulations refer to <http://www4.law.cornell.edu/uscode/>. For State regulations refer to www.leginfo.ca.gov. All other references are available upon request.

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Figures

Attachment A

Attachment B

Attachment C

Attachment D